

## Corporate Human Rights Benchmark 2018 Company Scoresheet



**Company Name** Target  
**Industry** Apparel & Agricultural Products (Supply Chain only)  
**Overall Score (\*)** 15.9 out of 100

Theme Score	Out of	For Theme
1.3	10	A. Governance and Policies
1.8	25	B. Embedding Respect and Human Rights Due Diligence
2.1	15	C. Remedies and Grievance Mechanisms
7.2	20	D. Performance: Company Human Rights Practices
0.0	20	E. Performance: Responses to Serious Allegations
3.5	10	F. Transparency

(\*) Please note that any small differences between the Overall Score and the added total of Measurement Theme scores are due to rounding the numbers at different stages of the score calculation process.

Please note also that the "Not met" labels in the Explanation boxes below do not necessarily mean that the company does not meet the requirements as they are described in the bullet point short text. Rather, it means that the analysts could not find information *in public sources* that met the requirements *as described in full* in the CHRB 2018 Methodology document. For example, a "Not met" under "General HRs Commitment", which is the first bullet point for indicator A.1.1, does not necessarily mean that the company does not have a general commitment to human rights. Rather, it means that the CHRB could not identify a public statement of policy in which the company commits to respecting human rights.

### Detailed assessment

#### A. Governance and Policies (10% of Total)

##### A.1 Policy Commitments (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1.1	Commitment to respect human rights	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Not met: General HRs commitment: Although the Company has a website section named 'Labor and Human Rights Policies' there is no general human rights commitment. [Labor &amp; Human Rights Policies: <a href="http://corporate.target.com">corporate.target.com</a>]</li> <li>Not met: UNGC principles 1 &amp; 2</li> <li>Not met: UDHR</li> <li>Not met: International Bill of Rights</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Not met: UNGPs</li> <li>Not met: OECD</li> </ul>
A.1.2	Commitment to respect the human rights of workers	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Not met: ILO Core</li> <li>Not met: UNGC principles 3-6</li> <li>Not met: All four ILO for AG suppliers: The Company states in the vendor conduct guide that 'we require all vendors, suppliers, manufacturers, contractors, subcontractors and their agents (collectively, "suppliers"), to abide the following standards'. These Standards include most ILO core areas except collective bargaining. Regarding 'No forced Labor or Human Trafficking' the guide indicates 'we condemn forced labor and human trafficking and will not knowingly work with suppliers who engage in these practices'. On 'no underage labor' the guide states that 'we do not tolerate the use of underage labor and will not knowingly work</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>with suppliers that utilize underage workers'. Regarding 'no discrimination' it states 'we respect cultural and individual differences, and believe discrimination should not be tolerated. Suppliers are expected to maintain a discrimination-free workplace and to employ legally-eligible workers based on their abilities...' Finally, concerning freedom of association, the guide states 'we seek suppliers who productively engage workers and value them as critical assets to sustainable business success. This includes respecting the rights of workers to make an informed decision as to whether to associate or not with any group, consistent with all applicable laws' [Vendor Conduct Guide, 2016: <a href="http://corporate.target.com">corporate.target.com</a>]</p> <ul style="list-style-type: none"> <li>• Not met: All four ILO for AP suppliers: See above [Vendor Conduct Guide, 2016: <a href="http://corporate.target.com">corporate.target.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: All four ILO Core: Regarding its own operations, the Company indicates in the code of business conduct that 'Target does not tolerate discrimination or harassment in any way – in hiring, training, advancement, compensation or termination'. It has not disclosed a formal commitment in relation to all other ILO core areas. [Code of Business Conduct: <a href="http://corporate.target.com">corporate.target.com</a>]</li> <li>• Met: Respect H&amp;S of workers: The code also contains commitments on workplace safety, as it indicates that 'Target is committed to maintaining a safe workplace for our guests and team members. Target has safety programs to reduce or eliminate workplace hazards. You are accountable for following the safety programs that apply to your job to protect yourself and others' [Code of Business Conduct: <a href="http://corporate.target.com">corporate.target.com</a>]</li> <li>• Met: H&amp;S applies to AG suppliers: Regarding H&amp;S the guides states that 'suppliers must provide a safe and healthy working environment that complies with local laws and minimizes occupational hazards. If suppliers provide residential facilities for their workers, they must be safe and sanitary'. [Vendor Conduct Guide, 2016: <a href="http://corporate.target.com">corporate.target.com</a>]</li> <li>• Met: H&amp;S applies to AP suppliers: See above [Vendor Conduct Guide, 2016: <a href="http://corporate.target.com">corporate.target.com</a>]</li> <li>• Not met: working hours for employees</li> <li>• Met: Working hours for AP suppliers: On 'working hours and overtime' its Vendor Code of Conduct states, among other things, that 'suppliers must not allow working hours that exceed the applicable legal limit, or 60 hours per week, whichever is less. Regularly paid hours must not exceed 48 per week and overtime hours must not exceed 12 hours per week or the amount specified by local law, whichever is less' [Vendor Conduct Guide, 2016: <a href="http://corporate.target.com">corporate.target.com</a>]</li> </ul>
A.1.3.a.AG	Commitment to respect human rights particularly relevant to the industry - land and natural resources (AG)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Respect land ownership and resources</li> <li>• Not met: Respecting the right to water</li> <li>• Not met: Expecting suppliers to respect these rights</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Voluntary Guidelines on Tenure</li> <li>• Not met: IFC Performance Standards</li> <li>• Not met: FPIC for all</li> <li>• Not met: Zero tolerance for land grabs</li> <li>• Not met: Respecting the right to water</li> <li>• Not met: Expecting suppliers to respect these rights</li> </ul>
A.1.3.b.AG	Commitment to respect human rights particularly relevant to the industry - people's rights (AG)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Women's rights</li> <li>• Not met: Children's rights</li> <li>• Not met: Migrant worker's rights</li> <li>• Not met: Expects suppliers to respect these rights</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: CEDAW/Women's Empowerment Principles</li> <li>• Not met: Child Rights Convention/Business Principles</li> <li>• Not met: Convention on migrant workers</li> <li>• Not met: Expecting suppliers to respect these rights</li> </ul>
A.1.3.AP	Commitment to respect human rights particularly relevant to the industry (AP)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Women's Rights</li> <li>• Not met: Children's Rights</li> <li>• Not met: Migrant worker's rights</li> <li>• Not met: Expecting suppliers to respect these rights</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: CEDAW/Women's Empowerment Principles</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Not met: Child Rights Convention/Business principles</li> <li>• Not met: Convention on migrant workers</li> <li>• Not met: Respecting the right to water</li> <li>• Not met: Expecting suppliers to respect these rights</li> </ul>
A.1.4	Commitment to engage with stakeholders	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Commits to stakeholder engagement: The Company indicates in the stakeholder engagement section of its website 'At Target, we aim to leverage our size, scale and reach to positively impact the communities in which we serve and operate. Going beyond what we can achieve in our own operations and with our vendors, we collaborate with NGOs, governments, industry organizations and other businesses to innovate solutions to the most pressing issues we face today. They also help us influence how we support our team members and guests'. However, it does not have a formal commitment to engage with potentially and actually affected stakeholders, nor has a public statement committing to engage with affected stakeholders and their legitimate representatives in the development or monitoring of its human rights approach. [Stakeholder Engagement: <a href="https://corporate.target.com">corporate.target.com</a>]</li> <li>• Met: Regular stakeholder engagement: In its CSR Report 2018 the Company describes some examples of its engagement actions with potentially affected stakeholders: 'We believe that improving worker well-being is about enriching and protecting the people who help create our products, the families they support and the communities where they live and work. We focus our global livelihood efforts on engaging with manufacturing supply chain workers to elevate their well-being.', 'We are working alongside our suppliers, global sourcing experts and other key partners to help prevent forced labor in global supply chains. We are utilizing new technologies, community engagement programs, prevention efforts and more robust standards related to abuses that occur outside the four walls of a factory.' [Corporate Social Responsibility Report, 2018: <a href="https://corporate.target.com">corporate.target.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Commits to engage stakeholders in design</li> <li>• Not met: Regular stakeholder design engagement</li> </ul>
A.1.5	Commitment to remedy	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Commits to remedy</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Not obstructing access to other remedies</li> <li>• Not met: Collaborating with other remedy initiatives</li> <li>• Not met: Work with AG suppliers to remedy impacts</li> <li>• Not met: Work with AP suppliers to remedy impacts</li> </ul>
A.1.6	Commitment to respect the rights of human rights defenders	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Zero tolerance attacks on HRs Defenders (HRDs)</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Expects AG suppliers to reflect company HRD commitments</li> <li>• Not met: Expects AP suppliers to reflect company HRD commitments</li> </ul>

### A.2 Policy Commitments (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.2.1	Commitment from the top	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: CEO or Board approves policy: The Company's code of business conduct is signed by the Chairman &amp; CEO and the Chief Risk Compliance officer. [Code of Business Conduct: <a href="https://corporate.target.com">corporate.target.com</a>]</li> <li>• Met: Board level responsibility for HRs: According to its 'Risk and Compliance Committee' document, this Committee has 'To assist the Board of Directors in overseeing the Corporation's ethics and compliance programs', which include its Business Conduct Guide [Risk and Compliance Committee Charter: <a href="https://investors.target.com">investors.target.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Speeches/letters by Board members or CEO</li> </ul>
A.2.2	Board discussions	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Board/Committee review of salient HRs</li> <li>• Not met: Examples or trends re HR discussion</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both examples and process</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.2.3	Incentives and performance management	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Incentives for at least one board member</li> <li>• Not met: At least one key AG HR risk, beyond employee H&amp;S</li> <li>• Not met: At least one key AP HR risk, beyond employee H&amp;S</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Performance criteria made public</li> </ul>

## B. Embedding Respect and Human Rights Due Diligence (25% of Total)

### B.1 Embedding Respect for Human Rights in Company Culture and Management Systems (10% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.1	Responsibility and resources for day-to-day human rights functions	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Senior responsibility fo HR (inc ILO): In its CSR Report 2016, the Company indicates: ' The Vice President of CSR and CSR team work with functional leaders across the company to determine strategies, policies and goals related to sustainability.' However, its Code of Conduct does not include all ILO core. [Corporate Social Responsibility Report, 2016: <a href="http://corporate.target.com">corporate.target.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Day-to-day responsibility</li> <li>• Not met: Day-to-day responsibility for AG in supply chain: In its website section 'Social compliance audit process' the Company indicates: 'Our responsible sourcing audits are performed on an unannounced basis. We use a combination of our own auditors and qualified, third-party auditors to validate a factory's compliance with Target's Standards of Vendor Engagement and applicable laws. When we use third-party auditors, we provide them with extensive training within Target's processes, which they are required to apply.' However there is no specific information describing how day to day responsibilities in supply chain are allocated. [Social Compliance Audit Process: <a href="http://corporate.target.com">corporate.target.com</a>]</li> <li>• Not met: Day-to-day responsibility for AP in supply chain: See above</li> </ul>
B.1.2	Incentives and performance management	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Senior manager incentives for human rights</li> <li>• Not met: At least one key AG HR risk, beyond employee H&amp;S</li> <li>• Not met: At least one key AP HR risk, beyond employee H&amp;S</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Performance criteria made public</li> </ul>
B.1.3	Integration with enterprise risk management	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: HR part of enterprise risk system: The Company indicates in the Risk and Compliance Committee Charter that the Committee shall 'Oversee the Corporation's risk management policies and procedures dealing with risk identification and risk assessment for the principal operational, business, and compliance risks facing the Corporation, whether internal or external in nature including, but not limited to, the risks and incident responses associated with: information security; business continuity and disaster recovery; vendor management; operations risks; supply chain risks, including the use of human capital in the supply chain; employment practices; and safety and environmental matters'. However, the Company has not disclosed documents describing how human rights risk are integrated as part of the risk management systems. The annual report 2017 contains the risk factors identified and it does not describe risks related to human rights. [Risk and Compliance Committee Charter: <a href="http://investors.target.com">investors.target.com</a> &amp; Annual Report, 2017: <a href="http://investors.target.com">investors.target.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Audit Ctte or independent risk assessment</li> </ul>
B.1.4.a	Communication /dissemination of policy commitment(s) within Company's own operations	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Communicates its policy to all workers in own operations: The Company's policies and commitments do not contain commitments including all the ILO core labour areas, and it does not indicate to which languages the existing commitments have been translated. [Code of Business Conduct: <a href="http://corporate.target.com">corporate.target.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Communication of policy commitments to stakeholder</li> <li>• Not met: How policy commitments are made accessible to audience</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.4.b	Communication /dissemination of policy commitment(s) to business relationships	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Steps to communicate policy commitments to BRs: The Company indicates in the Vendor Conduct guide that 'we require all of our merchandise vendors to read, understand and comply with our Standards of Vendor Engagement and all other conditions of doing business with Target. Additionally, we expect our vendors to ensure all of their factories understand and comply with these expectations'. It also indicates on its website: Responsible sourcing - social compliance section that 'all factories producing Target brand products are required to post these standards in a visible place and in a language that their workers understand'. However, these standards do not include the ILO core area of collective bargaining and the Company does not indicate whether it includes human rights policy commitments within contractual or other binding agreements. [Vendor Conduct Guide, 2016: <a href="http://corporate.target.com">corporate.target.com</a> &amp; Responsible Sourcing: <a href="http://corporate.target.com">corporate.target.com</a>]</li> <li>• Not met: Including to AG suppliers: See above</li> <li>• Not met: Including to AP suppliers: See above</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: How HR commitments made binding/contractual: See above</li> <li>• Not met: Including on AG suppliers: See above</li> <li>• Not met: Including on AP suppliers: See above</li> </ul>
B.1.5	Training on Human Rights	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Trains all workers on HR policy commitments: The Company indicates in its website: 'We provide our vendors a variety of social-compliance training, including orientation at headquarters and overseas locations and web-based training programs on topics like preventing human trafficking, underage labor, working hours and health and safety management. We also provide self-audit forms to help vendors improve their performance.' However, this training refers to vendors, and it does not indicate whether it conducts training all relevant managers and workers of the Company. Also, the Company's commitments don't include all ILO Core areas. [Responsible Sourcing: <a href="http://corporate.target.com">corporate.target.com</a>]</li> <li>• Not met: Trains relevant AG managers including procurement</li> <li>• Not met: Trains relevant AP managers including procurement</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> </ul>
B.1.6	Monitoring and corrective actions	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Monitoring implementation of HR policy commitments</li> <li>• Not met: Monitoring AG suppliers: Regarding suppliers, the Company reports on its website: 'We require that all vendors who produce our owned-brand products participate in a comprehensive social compliance audit process.' In its website section about the audit process it indicates: 'Target has developed an audit model that segments responsible sourcing risk by country. [...] The purpose of Target's social compliance audit is to assess factory conditions, worker treatment and compensation, hiring processes, environmental practices and more generally, compliance with applicable laws. Our responsible sourcing audits are performed on an unannounced basis. We use a combination of our own auditors and qualified, third-party auditors to validate a factory's compliance with Target's Standards of Vendor Engagement and applicable laws. However, its Vendor Conduct Guide does not cover all ILO core. [Responsible Sourcing: <a href="http://corporate.target.com">corporate.target.com</a> &amp; Social Compliance Audit Process: <a href="http://corporate.target.com">corporate.target.com</a>]</li> <li>• Not met: Monitoring AP suppliers: See above [Responsible Sourcing: <a href="http://corporate.target.com">corporate.target.com</a> &amp; Social Compliance Audit Process: <a href="http://corporate.target.com">corporate.target.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Describes corrective action process</li> <li>• Not met: Example of corrective action</li> <li>• Not met: Discloses % of AG supply chain monitored: Although the Company discloses in the CSR report 2016 quantitative data regarding audits, including that it performed 1,370 audits in 2016, it does not disclose the proportion of supply chain monitored. In addition, its Vendor Conduct Guide does not cover all ILO core. [Corporate Social Responsibility Report, 2016: <a href="http://corporate.target.com">corporate.target.com</a>]</li> <li>• Not met: Discloses % of AP supply chain monitored: See above</li> </ul>
B.1.7	Engaging business relationships	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: HR affects AG selection of suppliers: On its website the Company indicates: 'Our Target Sourcing Services team sources Target-brand merchandise from all over the world, anticipating issues and potential risks while making the</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>best decisions for our business. We continually evaluate the mix of countries from which we source and adjust for many factors, including production quality, social responsibility, capacity, speed to market and pricing.' However CHRB could not find further information on how human rights performance is taken into consideration in the selection of potential business relationships, including suppliers.</p> <p>[Responsible Sourcing: <a href="http://corporate.target.com">corporate.target.com</a>]</p> <ul style="list-style-type: none"> <li>• Not met: HR affects AP selection of suppliers: See above [Responsible Sourcing: <a href="http://corporate.target.com">corporate.target.com</a>]</li> <li>• Met: HR affects on-going AG supplier relationships: On its website section 'Social compliance audit process' the Company indicates: 'A factory is Non-Compliant if: Severe violations are discovered, including: underage labor, forced labor, corporal punishment, attempted bribery, sandblasting, unauthorized subcontracting, egregious wastewater treatment and/or absence of appropriate licensing/permitting; It fails three consecutive audits; An excessive number of violations are discovered; or The auditor is denied access twice. Non-compliant audits will result in the cancellation of purchase orders and/or termination of the business relationship.' [Social Compliance Audit Process: <a href="http://corporate.target.com">corporate.target.com</a>]</li> <li>• Met: HR affects on-going AP supplier relationships: See above [Social Compliance Audit Process: <a href="http://corporate.target.com">corporate.target.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both requirement under score 1 met</li> <li>• Not met: Working with AG suppliers to improve performance</li> <li>• Not met: Working with AP suppliers to improve performance</li> </ul>
B.1.8	Approach to engagement with potentially affected stakeholders	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Stakeholder process or systems: The Company lists all the stakeholders it has identified and the engagement carried out with them, including, among others, vendors, civil society organizations and its employees including issues like fair wages and benefits and worker well-being. [Corporate Social Responsibility Report, 2018: <a href="http://corporate.target.com">corporate.target.com</a>]</li> <li>• Met: Frequency and triggers for engagement: The Company indicates that it engages with vendors in annual meetings, trainings and workshops, annual owned-brand vendor meetings. It also indicates that other way of engagement is through annual assessments. [Corporate Social Responsibility Report, 2018: <a href="http://corporate.target.com">corporate.target.com</a>]</li> <li>• Met: Workers in AG SC engaged: Including issues such as fair wages and benefits and worker well-being. [Corporate Social Responsibility Report, 2018: <a href="http://corporate.target.com">corporate.target.com</a>]</li> <li>• Met: Workers in AP SC engaged: See above [Corporate Social Responsibility Report, 2018: <a href="http://corporate.target.com">corporate.target.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Analysis of stakeholder views and company's actions on them</li> </ul>

## B.2 Human Rights Due Diligence (15% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.1	Identifying: Processes and triggers for identifying human rights risks and impacts	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Identifying risks in own operations: Concerning its own operations, the Company indicates the following in the CSR report 2016: 'Because Target doesn't own its factories, our global sourcing offices are the only operations we own. These offices are subject to the same standards and policies as our domestic offices. Human rights considerations are made when exploring new countries for office locations.' [Corporate Social Responsibility Report, 2016: <a href="http://corporate.target.com">corporate.target.com</a>]</li> <li>• Not met: Identifying risks in AG suppliers: It also discloses in the report the total number and percentage of operations that have been subject to human rights reviews of human rights impact assessments, broken down by country. However, it does not describe the process to identify human rights risks and impacts in supply chain, nor the global systems in place to identify its human rights risks and impacts on regular basis across its activities consulting with experts and potentially affected stakeholders (including supply chain). [Corporate Social Responsibility Report, 2016: <a href="http://corporate.target.com">corporate.target.com</a>]</li> <li>• Not met: Identifying risks in AP suppliers: See above</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Ongoing global risk identification: See above</li> <li>• Not met: In consultation with stakeholders: See above</li> <li>• Not met: In consultation with HR experts: See above</li> <li>• Not met: Triggered by new circumstances</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Not met: Explains use of HRIAs or ESIA (inc HR)</li> </ul>
B.2.2	Assessing: Assessment of risks and impacts identified (salient risks and key industry risks)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Salient risk assessment (and context)</li> <li>• Not met: Public disclosure of salient risks</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> </ul>
B.2.3	Integrating and Acting: Integrating assessment findings internally and taking appropriate action	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Action Plans to mitigate risks</li> <li>• Not met: Example of Actions decided</li> <li>• Not met: Including in AG supply chain</li> <li>• Not met: Including in AP supply chain</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> </ul>
B.2.4	Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: System to check if Actions are effective</li> <li>• Not met: Lessons learnt from checking effectiveness</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both requirement under score 1 met</li> </ul>
B.2.5	Communicating : Accounting for how human rights impacts are addressed	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Comms plan re identifying risks</li> <li>• Not met: Comms plan re assessing risks</li> <li>• Not met: Comms plan re action plans for risks</li> <li>• Not met: Comms plan re reviewing action plans</li> <li>• Not met: Including AG suppliers</li> <li>• Not met: Including AP suppliers</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Responding to affected stakeholders concerns</li> <li>• Not met: Ensuring affected stakeholders can access communications</li> </ul>

### C. Remedies and Grievance Mechanisms (15% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.1	Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Channel accessible to all workers: In its Business Code of Conduct the Company discloses contact information for its Hotline system, which is addressed to all 'team members' (employees) in order to resolve any concerns or issues related to the Company's ethical culture reflected on its Code of Business Conduct, which include human rights grievances such as dignity and respect, wage and hour and safety. [Code of Business Conduct: <a href="https://corporate.target.com">corporate.target.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Number grievances filed, addressed or resolved</li> <li>• Met: Channel is available in all appropriate languages: The Company indicates that interpreters are available and its EthicsPoint website is available in 14 languages. [Code of Business Conduct: <a href="https://corporate.target.com">corporate.target.com</a> &amp; EthicsPoint-Target: <a href="https://secure.ethicspoint.com">secure.ethicspoint.com</a>]</li> <li>• Not met: Expect AG supplier to have equivalent grievance systems</li> <li>• Met: Opens own system to AG supplier workers: In its Vendor Code of Conduct the Company discloses the different channels available to report violations by suppliers' worker and indicates: 'All reported violations that include specific information will be investigated and appropriate action will be taken'. [Vendor Conduct Guide, 2016: <a href="https://corporate.target.com">corporate.target.com</a>]</li> <li>• Not met: Expect AP supplier to have equivalent grievance systems</li> <li>• Met: Opens own system to AP supplier workers: See above [Vendor Conduct Guide, 2016: <a href="https://corporate.target.com">corporate.target.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.2	Grievance channel(s)/mechanism(s) to receive complaints or concerns from external individuals and communities	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Grievance mechanism for community: The Company code of business conduct indicates the steps followed when calling the integrity hotline: (2) 'Your call is answered by a third-party representative who specializes in hotline calls'. (3)'The representative asks for details about the incident or concern, like parties involved, location, etc. You can choose to remain anonymous and decline to provide answers to any questions'. (4) 'The representative emails a report to the Target Integrity Hotline team at headquarters and you receive a report ID number that you can use to check on the status of your report. If you have decided to remain anonymous, you will not be identified in the report'. (5) The Target Integrity Hotline team at headquarters reviews the report and assigns it to an investigator. The investigator researches the report and may contact you if you shared your identity'. (6) 'If your report is substantiated, target will take prompt and appropriate action. Conclusions of the investigation may remain confidential'. 'Target performs investigations and takes remedial action in a matter that is respectful, consistent and fair. You are expected to cooperate in any investigation and can be confident that you will not experience any retaliation for raising concern in good faith or for cooperating with an investigation'. On its EthicsPoint website, the FAQ document indicates: 'We always encourage you to speak with a leader or Human Resources representative at your location if you have questions or witness illegal or unethical workplace behaviour. It's usually the fastest and most direct way to resolve an issue. However, if you are uncomfortable speaking with a leader or HR for any reason, you may call the hotline, use the web form, or email Integrity@Target.com'.</li> </ul> <p>The Company , however, does not indicate whether external individuals and communities can make use of these mechanism/channel. [Code of Business Conduct: <a href="http://corporate.target.com">corporate.target.com</a> &amp; Target Integrity Hotline: <a href="http://targetintegrityhotline.com">targetintegrityhotline.com</a>]</p> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Describes accessibility and local languages: The Company indicates that interpreters are available and its EthicsPoint website is available in 14 languages. However, there is no evidence to support the accessibility for external stakeholders to its grievance mechanisms. [EthicsPoint-Target: <a href="http://secure.ethicspoint.com">secure.ethicspoint.com</a>]</li> <li>• Not met: Expects AG supplier to have community grievance systems</li> <li>• Not met: AG supplier communities use global system: See above</li> <li>• Not met: Expects AP supplier to have community grievance systems</li> <li>• Not met: AP supplier communities use global system: See above</li> </ul>
C.3	Users are involved in the design and performance of the channel(s)/mechanism(s)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Engages users to create or assess system</li> <li>• Not met: Description of how they do this</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Engages with users on system performance</li> <li>• Not met: Provides user engagement example on performance</li> <li>• Not met: AG suppliers consult users in creation or assessment</li> <li>• Not met: AP suppliers consult users in creation or assessment</li> </ul>
C.4	Procedures related to the mechanism(s)/channel(s) are publicly available and explained	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Response timescales: In its Business Code of Conduct the Company there is a section named 'What to expect when you call to Integrity Hotline' where it states: 'Your call is answered by a third-party representative who specializes in hotline calls. [...] The representative emails a report to the Target Integrity Hotline team at headquarters and you receive a report ID number that you can use to check on the status of your report. [...] The Target Integrity Hotline team at headquarters reviews the report and assigns it to an investigator. The investigator researches the report and may contact you if you have shared your identity. [...] If your report is substantiated, Target will take prompt and appropriate action. Conclusions of the investigation may remain confidential.'</li> </ul> <p>Company's Code of business conduct indicates the steps followed when calling the integrity hotline, however it does not indicate the timescales for responses at each stage. [Code of Business Conduct: <a href="http://corporate.target.com">corporate.target.com</a>]</p> <ul style="list-style-type: none"> <li>• Not met: How complainants will be informed: It does not indicate whether external individuals and communities can make use of these mechanism/channel. [Code of Business Conduct: <a href="http://corporate.target.com">corporate.target.com</a>]</li> </ul>



Indicator Code	Indicator name	Score (out of 2)	Explanation
			Score 2 <ul style="list-style-type: none"> <li>Not met: Escalation to senior/independent level: See above [Code of Business Conduct: <a href="https://corporate.target.com">corporate.target.com</a>]</li> </ul>
C.5	Commitment to non-retaliation over complaints or concerns made	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Met: Public statement prohibiting retaliation: In its Business Code of Conduct the Company states: 'Target prohibits retaliation against anyone who reports their concerns in good faith. You can be confident that Target will investigate a report of an actual or suspected violation promptly and fairly.' [Code of Business Conduct: <a href="https://corporate.target.com">corporate.target.com</a>]</li> <li>Met: Practical measures to prevent retaliation: It also indicates: 'You can choose to remain anonymous and decline to provide answers to any questions' [Code of Business Conduct: <a href="https://corporate.target.com">corporate.target.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Not met: Has not retaliated in practice</li> <li>Not met: Expects AG suppliers to prohibit retaliation</li> <li>Not met: Expects AP suppliers to prohibit retaliation</li> </ul>
C.6	Company involvement with State-based judicial and non-judicial grievance mechanisms	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Not met: Won't impede state based mechanisms</li> <li>Not met: Complainants not asked to waive rights</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Not met: Will work with state based or non judicial mechanisms</li> <li>Not met: Example of issue resolved (if applicable)</li> </ul>
C.7	Remedying adverse impacts and incorporating lessons learned	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Not met: Describes how remedy has been provided</li> <li>Not met: Says how it would remedy key sector risks</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Not met: Changes introduced to stop repetition</li> <li>Not met: Approach to learning from incident to prevent future impacts</li> <li>Not met: Evaluation of the channel/mechanism</li> </ul>

## D. Performance: Company Human Rights Practices (20% of Total)

### D.1 Agricultural Products

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.1.1.b	Living wage (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Not met: Living wage in supplier code or contracts: The Vendor Conduct guide contain a requirement regarding wages indicating that: 'Suppliers must provide wages and benefits that meet or exceed local law requirements and are paid/provided in a timely manner. We encourage suppliers to commit to the betterment of wages and benefits to improve the lives of workers and their families in the communities where they live'. However, the Company has not explained how these practices are taken into consideration in the identification and selection of suppliers, or how it works with suppliers to improve their living wage practices. [Vendor Conduct Guide, 2016: <a href="https://corporate.target.com">corporate.target.com</a> &amp; Social Compliance Audit Process: <a href="https://corporate.target.com">corporate.target.com</a>]</li> <li>Not met: Improving living wage practices of suppliers: See above [Vendor Conduct Guide, 2016: <a href="https://corporate.target.com">corporate.target.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Not met: Both requirements under score 1 met</li> <li>Not met: Provides analysis of trends in progress made</li> </ul>
D.1.2	Aligning purchasing decisions with human rights	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Not met: Avoids business model pressure on HRs (purchasing practices)</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Not met: Positive incentives to respect human rights (purchasing practices): On its website section 'Social Compliance Operations', the Company indicates: 'Target uses multiple data points to analyse the performance of our vendors, who are held accountable for responsible sourcing performance in the facilities that they use for Target owned brand production. Audit results are one of the metrics we use when assigning performance levels to vendors. These results reflect their risk level. [...] Vendor Performance Overview (VPO) is an internal tool we created to provide an in-depth review and analysis of a vendor's performance across multiple areas of social compliance. The analysis includes a compilation of recent audit results, facility registration accuracy and the ability to provide complete and acceptable corrective action plans. The VPO score helps us to identify areas of opportunity for each vendor, which we discuss with them.' However, it is not clear whether the VPO is used to apply a positive incentive system (increase orders or premium prices to top performers). [Social Compliance Operations: <a href="https://corporate.target.com">corporate.target.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> </ul>
D.1.3	Mapping and disclosing the supply chain	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Identifies suppliers back to manufacturing sites (factories or fields): In its website section 'Responsible sourcing' the company indicates: 'Target is committed to increased supply chain transparency. To meet this objective, we publish a list of all list of all tier one factories that produce our owned-brand products as well as tier two apparel textile suppliers and wet processing facilities.' [Responsible Sourcing: <a href="https://corporate.target.com">corporate.target.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Discloses significant parts of SP and why: The Company discloses a list of factories in order to increase supply chain transparency. This list includes all registered factories (including food) producing Target owned brand products, and details factory name and city where it's located. [Factory List, Mar 2018: <a href="https://corporate.target.com">corporate.target.com</a>]</li> </ul>
D.1.4.b	Child labour: Age verification and corrective actions (in the supply chain)	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Child Labour rules in codes or contracts: Regarding child or underage labour, the Vendor Conduct Guide states that 'We do not tolerate the use of underage labor and will not knowingly work with suppliers that utilize underage workers. [...] Suppliers must comply with all age-related working restrictions as set by local law and adhere to international standards as defined by the International Labor Organization (ILO) regarding age appropriate work'. In addition, on its website section 'Labour and human rights policies', the Company indicates: 'During our audit, we review personnel records and discuss the hiring process with management. We verify that they have a formal procedure in place that includes reviewing age documentation and eliminating high-risk candidates.' Further more the Company is working with Better Work to remediate any cases of underage labor. [Vendor Conduct Guide, 2016: <a href="https://corporate.target.com">corporate.target.com</a> &amp; Labor &amp; Human Rights Policies: <a href="https://corporate.target.com">corporate.target.com</a>]</li> <li>• Not met: How working with suppliers on child labour: The Company is working with the Good Weave Label in India to improve working conditions and eliminate child labor. However, these practices refer to apparel supply chain. [Corporate Social Responsibility Report, 2018: <a href="https://corporate.target.com">corporate.target.com</a> &amp; Good Wave label: <a href="https://goodweave.org">goodweave.org</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> <li>• Not met: Analysis of trends in progress made</li> </ul>
D.1.5.b	Forced labour: Debt bondage and other unacceptable financial costs (in the supply chain)	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Debt and fees rules in codes or contracts: On its website section 'Labor and Human Rights Policies', the Company indicates: 'We expect all workers, including imported and migrant workers, to be provided wages, benefits and working conditions that are fair and in accordance with local law. We do not condone holding workers' passports to keep them from leaving, charging any type of fee or deposit for employment, or any other unfair practice. We review these policies in detail during our audit process and expect our vendors to share these views and comply.' [Labor &amp; Human Rights Policies: <a href="https://corporate.target.com">corporate.target.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Met: How working with suppliers on debt &amp; fees: The Company describes in its CSR Report 2018 some examples of its works with suppliers on debt and fees issues: 'We have enlisted Verité to develop policies for our suppliers to protect foreign contract workers in our supply chain – seeking to set clear expectations for suppliers and laying out procedures, standards and verification mechanisms that will help support our adoption of the Employer Pays Principle.', ' Target joined the RBA's Responsible Labor Initiative's Steering Committee in 2017 to continue to develop cross-industry approaches to advancing labor practices, specifically related to responsible recruitment and protections for foreign migrant workers.' [Corporate Social Responsibility Report, 2018: <a href="http://corporate.target.com">corporate.target.com</a>]</li> <li>Score 2</li> <li>• Met: Both requirements under score 1 met</li> <li>• Not met: Analysis of trends in progress made</li> </ul>
D.1.5.d	Forced labour: Restrictions on workers (in the supply chain)	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Free movement rules in codes or contracts: The Company states on its Vendor Code: 'Workers have the right to freedom of movement and our suppliers must ensure it is afforded to them'. In addition, on its website section 'labor &amp; human rights policies', the Company states: 'We do not condone holding workers' passports to keep them from leaving, charging any type of fee or deposit for employment, or any other unfair practice. We review these policies in detail during our audit process and expect our vendors to share these views and comply.' [Vendor Conduct Guide, 2016: <a href="http://corporate.target.com">corporate.target.com</a> &amp; Labor &amp; Human Rights Policies: <a href="http://corporate.target.com">corporate.target.com</a>]</li> <li>• Met: How working with suppliers on free movement: In its CSR Report 2018, the Company indicates: 'Our CEO Brian Cornell sits on the Board of Directors of The Consumer Goods Forum, and we have adopted the organization's Resolution on Forced Labor. The resolution is the first industry commitment of its kind and includes the adoption of three key principles: that every worker should have freedom of movement, no worker should pay for a job and no worker should be indebted or coerced to work.' [Corporate Social Responsibility Report, 2018: <a href="http://corporate.target.com">corporate.target.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Both requirements under score 1 met</li> <li>• Not met: Analysis of trends in progress made</li> </ul>
D.1.6.b	Freedom of association and collective bargaining (in the supply chain)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: FoA &amp; CB rules in codes or contracts [Vendor Conduct Guide, 2016: <a href="http://corporate.target.com">corporate.target.com</a>]</li> <li>• Not met: How working with suppliers on FoA and CB</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> <li>• Not met: Provides analysis of trends in progress made</li> </ul>
D.1.7.b	Health and safety: Fatalities, lost days, injury rates (in the supply chain)	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Sets out clear Health and Safety requirements: In its Vendor Conduct Guide the Company indicates: 'Suppliers must provide a safe and healthy working environment that complies with local laws and minimizes occupational hazards. If suppliers provide residential facilities for their workers, they must be safe and sanitary.' In addition, on its website section 'Labor and Human Rights Policies', the Company indicates: 'We conduct an in-depth review of a facility's health and safety practices across all buildings, reviewing everything from fire safety equipment and preparedness to worker safety, such as clean facilities, the availability of personal protective equipment, chemical safety and employee training.[...] Target emphasizes the importance of having measures in place to ensure that factory workers know what to do in an emergency, as well as policies and procedures to prevent emergencies. We provide our vendors with a variety of training materials, many in multiple languages, to educate them on the importance of being proactive and making safety a priority.' [Vendor Conduct Guide, 2016: <a href="http://corporate.target.com">corporate.target.com</a> &amp; Labor &amp; Human Rights Policies: <a href="http://corporate.target.com">corporate.target.com</a>]</li> <li>• Not met: Injury Rate disclosures: Concerning health and safety in the supply chain, the Company only discloses the 'average number of health and safety issues per audit'. No further details has been disclosed in published documents regarding quantitative data. [Corporate Social Responsibility Report, 2018: <a href="http://corporate.target.com">corporate.target.com</a>]</li> <li>• Not met: Lost days or near miss disclosures: See above [Corporate Social Responsibility Report, 2018: <a href="http://corporate.target.com">corporate.target.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Not met: Fatalities disclosure: See above [Corporate Social Responsibility Report, 2018: <a href="http://corporate.target.com">corporate.target.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Met: How working with suppliers on H&amp;S: In its CSR Report 2018, the Company indicates: 'Target has leaders in charge of safety and formal joint management-worker safety committees, which meet monthly in all store and supply chain locations. These Safety Committees are required to be composed of at least 50 percent non-exempt, and no more than 50 percent exempt employees. As Target does not track total numbers of participants, we cannot determine with certainty a percentage of the total workforce represented in these formal joint management-worker health and safety committees. However, approximately five percent of team members across all our stores and supply chain locations participate in safety meetings each month.' [Corporate Social Responsibility Report, 2018: <a href="http://corporate.target.com">corporate.target.com</a>]</li> </ul> <ul style="list-style-type: none"> <li>• Not met: Provide analysis of trends in progress made</li> </ul>
D.1.8.b	Land rights: Land acquisition (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Rules on land &amp; owners in codes or contracts</li> <li>• Not met: How working with suppliers on land issues</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> <li>• Not met: Provides analysis of trends in the progress made</li> </ul>
D.1.9.b	Water and sanitation (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Rules on water stewardship in codes or contracts</li> <li>• Not met: How working with suppliers on water stewardship issues: In its CSR Report 2018, the Company indicates: ' In 2017, we made an initial \$1 million investment in Water.org, as part of a collaborative effort to remove barriers to accessing affordable financing for water and sanitation in the communities where our goods are produced.' Although, this is a very important initiative, it does not represent an example of how the Company is working with its suppliers on water issues. [Corporate Social Responsibility Report, 2018: <a href="http://corporate.target.com">corporate.target.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> <li>• Not met: Provide analysis of trends in progress made</li> </ul>
D.1.10.b	Women's rights (in the supply chain)	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Women's rights in codes or contracts: In its Standards of Vendor Engagement, the Company states: 'Suppliers are expected to maintain a discrimination-free workplace and to employ legally-eligible workers based upon on their abilities, rather than their race, colour, sex, pregnancy status, gender identity, marital status, political opinions, religion, age, disability, sexual orientation, social origin, national origin or any other characteristics unrelated to an individual's ability to perform the work required by the job'. However, there are no guidelines related to the provision of equal pay for equal work, measures to ensure equal opportunities throughout all levels of employment and to eliminate health and safety concerns that are particularly prevalent among women workers. [Vendor Conduct Guide, 2016: <a href="http://corporate.target.com">corporate.target.com</a>]</li> <li>• Met: How working with suppliers on women's rights: In its CSR Report 2018, the Company indicates: 'In 2017, we began our partnership with CARE, an international NGO that addresses economic inclusion and marginalization of women and their communities, to empower female workers in our supply chain located in Bangladesh, Indonesia and Vietnam. In 2018, we are expanding upon this work to provide female workers with the enhanced capacity to identify, articulate and advocate for themselves on issues that affect their well-being.' [Corporate Social Responsibility Report, 2018: <a href="http://corporate.target.com">corporate.target.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> <li>• Not met: Provide analysis of trends in progress made</li> </ul>

## D.2 Apparel

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.2.1.b	Living wage (in the supply chain)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Living wage in supplier code or contracts: The Vendor Conduct guide contain a requirement regarding wages indicating that: 'Suppliers must provide wages and benefits that meet or exceed local law requirements and are paid/provided in a timely manner. We encourage suppliers to commit to the betterment of wages and benefits to improve the lives of workers and their families in the communities where they live'. However, the Company has not explained how these practices are taken into consideration in the identification and selection of suppliers, or how it works with suppliers to improve their living wage practices. [Vendor Conduct Guide, 2016: <a href="https://corporate.target.com">corporate.target.com</a> &amp; Social Compliance Audit Process: <a href="https://corporate.target.com">corporate.target.com</a>]</li> <li>• Not met: Improving living wage practices of suppliers: See above [Vendor Conduct Guide, 2016: <a href="https://corporate.target.com">corporate.target.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> <li>• Not met: Provide analysis of trends in progress made</li> </ul>
D.2.2	Aligning purchasing decisions with human rights	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Avoids business model pressure on HRs</li> <li>• Not met: Positive incentives to respect human rights: On its website section 'Social Compliance Operations', the Company indicates: 'Target uses multiple data points to analyse the performance of our vendors, who are held accountable for responsible sourcing performance in the facilities that they use for Target owned brand production. Audit results are one of the metrics we use when assigning performance levels to vendors. These results reflect their risk level. [...] Vendor Performance Overview (VPO) is an internal tool we created to provide an in-depth review and analysis of a vendor's performance across multiple areas of social compliance. The analysis includes a compilation of recent audit results, facility registration accuracy and the ability to provide complete and acceptable corrective action plans. The VPO score helps us to identify areas of opportunity for each vendor, which we discuss with them.' However, it is not clear whether the VPO is used to apply a positive incentive system (increase orders or premium prices to top performers). [Social Compliance Operations: <a href="https://corporate.target.com">corporate.target.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> </ul>
D.2.3	Mapping and disclosing the supply chain	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Identifies suppliers back to product source (farm, ranch etc): In its website section 'Responsible sourcing' the company indicates: 'Target is committed to increased supply chain transparency. To meet this objective, we publish a list of all tier one factories that produce our owned-brand products as well as tier two apparel textile suppliers and wet processing facilities.' [Responsible Sourcing: <a href="https://corporate.target.com">corporate.target.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Discloses significant parts of supply chain and why: The Company discloses a list of factories in order to increase supply chain transparency. This list includes all registered factories producing Target owned brand products, and details factory name and city where it's located. [Factory List, Mar 2018: <a href="https://corporate.target.com">corporate.target.com</a>]</li> </ul>
D.2.4.b	Child labour: Age verification and corrective actions (in the supply chain)	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Child Labour rules in codes or contracts: Regarding child or underage labour, the Vendor Conduct Guide states that 'We do not tolerate the use of underage labor and will not knowingly work with suppliers that utilize underage workers. [...] Suppliers must comply with all age-related working restrictions as set by local law and adhere to international standards as defined by the International Labor Organization (ILO) regarding age appropriate work'. In addition, on its website section 'Labour and human rights policies', the Company indicates: 'During our audit, we review personnel records and discuss the hiring process with management. We verify that they have a formal procedure in place that includes reviewing age documentation and eliminating high-risk candidates.' Further more the Company is working with Better Work to remediate any cases of underage labor. [Vendor Conduct Guide, 2016: <a href="https://corporate.target.com">corporate.target.com</a> &amp; Labor &amp; Human Rights Policies: <a href="https://corporate.target.com">corporate.target.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Met: How working with suppliers on child labour: The Company is working with the Good Weave Label in India to improve working conditions and eliminate child labor: 'Licensed producers must meet the requirements of the GoodWeave Standard—a standard rooted in three unwavering principles: No child labor is allowed; No forced or bonded labor is allowed; Workplace conditions are documented and verifiable. GoodWeave makes regular, unannounced inspections of all production facilities that cover tier one factories and all outsourced production, including homes, to verify compliance with this Standard.' [Corporate Social Responsibility Report, 2018: <a href="http://corporate.target.com">corporate.target.com</a> &amp; Good Wave label: <a href="http://goodweave.org">goodweave.org</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Both requirements under score 1 met</li> <li>• Not met: Provide analysis of trends in progress made</li> </ul>
D.2.5.b	Forced labour: Debt bondage and other unacceptable financial costs (in the supply chain)	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Debt and fees rules in codes or contracts: On its website section 'Labor and Human Rights Policies', the Company indicates: 'We expect all workers, including imported and migrant workers, to be provided wages, benefits and working conditions that are fair and in accordance with local law. We do not condone holding workers' passports to keep them from leaving, charging any type of fee or deposit for employment, or any other unfair practice. We review these policies in detail during our audit process and expect our vendors to share these views and comply.' [Labor &amp; Human Rights Policies: <a href="http://corporate.target.com">corporate.target.com</a>]</li> <li>• Met: How working with suppliers on debt &amp; fees: The Company describes in its CSR Report 2018 some examples of its works with suppliers on debt and fees issues: 'We have enlisted Verité to develop policies for our suppliers to protect foreign contract workers in our supply chain – seeking to set clear expectations for suppliers and laying out procedures, standards and verification mechanisms that will help support our adoption of the Employer Pays Principle.', ' Target joined the RBA's Responsible Labor Initiative's Steering Committee in 2017 to continue to develop cross-industry approaches to advancing labor practices, specifically related to responsible recruitment and protections for foreign migrant workers.' [Corporate Social Responsibility Report, 2018: <a href="http://corporate.target.com">corporate.target.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Both requirements under score 1 met</li> <li>• Not met: Provide analysis of trends in progress made</li> </ul>
D.2.5.d	Forced labour: Restrictions on workers (in the supply chain)	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Free movement rules in codes or contracts: The Company states on its Vendor Code: 'Workers have the right to freedom of movement and our suppliers must ensure it is afforded to them'. In addition, on its website section 'labor &amp; human rights policies', the Company states: 'We do not condone holding workers' passports to keep them from leaving, charging any type of fee or deposit for employment, or any other unfair practice. We review these policies in detail during our audit process and expect our vendors to share these views and comply.' [Vendor Conduct Guide, 2016: <a href="http://corporate.target.com">corporate.target.com</a> &amp; Labor &amp; Human Rights Policies: <a href="http://corporate.target.com">corporate.target.com</a>]</li> <li>• Met: How these practices are implemented and monitored for agencies, labour brokers or recruiters: In its CSR Report 2018, the Company indicates: 'Our CEO Brian Cornell sits on the Board of Directors of The Consumer Goods Forum, and we have adopted the organization's Resolution on Forced Labor. The resolution is the first industry commitment of its kind and includes the adoption of three key principles: that every worker should have freedom of movement, no worker should pay for a job and no worker should be indebted or coerced to work.' [Corporate Social Responsibility Report, 2018: <a href="http://corporate.target.com">corporate.target.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Both requirements under score 1 met</li> <li>• Not met: Provide analysis of trends in progress made</li> </ul>
D.2.6.b	Freedom of association and collective bargaining (in the supply chain)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: FoA &amp; CB rules in codes or contracts [Vendor Conduct Guide, 2016: <a href="http://corporate.target.com">corporate.target.com</a>]</li> <li>• Not met: How working with suppliers on FoA and CB</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> <li>• Not met: Provide analysis of trends in progress made</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.2.7.b	Health and safety: Fatalities, lost days, injury rates (in the supply chain)	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Sets out clear Health and Safety requirements: In its Vendor Conduct Guide the Company indicates: 'Suppliers must provide a safe and healthy working environment that complies with local laws and minimizes occupational hazards. If suppliers provide residential facilities for their workers, they must be safe and sanitary.' In addition, on its website section 'Labor and Human Rights Policies', the Company indicates: 'We conduct an in-depth review of a facility's health and safety practices across all buildings, reviewing everything from fire safety equipment and preparedness to worker safety, such as clean facilities, the availability of personal protective equipment, chemical safety and employee training.[...] Target emphasizes the importance of having measures in place to ensure that factory workers know what to do in an emergency, as well as policies and procedures to prevent emergencies. We provide our vendors with a variety of training materials, many in multiple languages, to educate them on the importance of being proactive and making safety a priority.' [Vendor Conduct Guide, 2016: <a href="https://corporate.target.com">corporate.target.com</a> &amp; Labor &amp; Human Rights Policies: <a href="https://corporate.target.com">corporate.target.com</a>]</li> <li>• Not met: Injury rate disclosures: Concerning health and safety in the supply chain, the Company only discloses the 'average number of health and safety issues per audit'. No further details has been disclosed in published documents regarding quantitative data. [Corporate Social Responsibility Report, 2018: <a href="https://corporate.target.com">corporate.target.com</a>]</li> <li>• Not met: Lost days or near miss disclosures: See above [Corporate Social Responsibility Report, 2018: <a href="https://corporate.target.com">corporate.target.com</a>]</li> <li>• Not met: Fatalities disclosures: See above [Corporate Social Responsibility Report, 2018: <a href="https://corporate.target.com">corporate.target.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: How working with suppliers on H&amp;S: In its CSR Report 2018, the Company indicates: 'Target has leaders in charge of safety and formal joint management-worker safety committees, which meet monthly in all store and supply chain locations. These Safety Committees are required to be composed of at least 50 percent non-exempt, and no more than 50 percent exempt employees. As Target does not track total numbers of participants, we cannot determine with certainty a percentage of the total workforce represented in these formal joint management-worker health and safety committees. However, approximately five percent of team members across all our stores and supply chain locations participate in safety meetings each month.' [Corporate Social Responsibility Report, 2018: <a href="https://corporate.target.com">corporate.target.com</a>]</li> <li>• Not met: Provide analysis of trends in progress made</li> </ul>
D.2.8.b	Women's rights (in the supply chain)	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Women's rights in codes or contracts: In its Standards of Vendor Engagement, the Company states: 'Suppliers are expected to maintain a discrimination-free workplace and to employ legally-eligible workers based upon on their abilities, rather than their race, color, sex, pregnancy status, gender identity, marital status, political opinions, religion, age, disability, sexual orientation, social origin, national origin or any other characteristics unrelated to an individual's ability to perform the work required by the job'. However, there are no guidelines related to the provision of equal pay for equal work, measures to ensure equal opportunities throughout all levels of employment and to eliminate health and safety concerns that are particularly prevalent among women workers. [Vendor Conduct Guide, 2016: <a href="https://corporate.target.com">corporate.target.com</a>]</li> <li>• Met: How working with suppliers on women's rights: In its CSR Report 2018, the Company indicates: 'In 2017, we began our partnership with CARE, an international NGO that addresses economic inclusion and marginalization of women and their communities, to empower female workers in our supply chain located in Bangladesh, Indonesia and Vietnam. In 2018, we are expanding upon this work to provide female workers with the enhanced capacity to identify, articulate and advocate for themselves on issues that affect their well-being.' [Corporate Social Responsibility Report, 2018: <a href="https://corporate.target.com">corporate.target.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both requirement under score 1 met</li> <li>• Not met: Provide analysis of trends in progress made</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.2.9.b	Working hours (in the supply chain)	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Working hours in codes or contracts: The Company's Vendor Conduct guide states: 'Suppliers must not allow working hours that exceed the applicable legal limit, or 60 hours per week, whichever is less. Regularly paid hours must not exceed 48 per week and overtime hours must not exceed 12 hours per week or the amount specified by local law, whichever is less. Only in exceptional cases, may working hours exceed 60 per week and only in the exceptional circumstances described within Applying the Standards of Vendor Engagement. Overtime work must always be voluntary and paid at a premium rate. Workers must have at least 1 full nonworking day in every 7-day period'. [Vendor Conduct Guide, 2016: <a href="http://corporate.target.com">corporate.target.com</a>]</li> <li>• Not met: How working with suppliers on working hours</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> <li>• Not met: Provide analysis of trends in progress made</li> </ul>

## E. Performance: Responses to Serious Allegations (20% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
E(1).0	Serious allegation No 1		<ul style="list-style-type: none"> <li>• Area: Forced labour</li> <li>• Headline: Crushing Debt Bondage Poses Forced Labor Risk for U.S. Port Truckers and Retailers using them</li> <li>• Sources: Huffington Post, 21/11/2017 - <a href="http://huffingtonpost.com">huffingtonpost.com</a> USA Today, 09/01/18 <a href="http://eu.usatoday.com">eu.usatoday.com</a> USA Today, 16/06/2017 - <a href="http://usatoday.com">usatoday.com</a> Naples daily News, 30/06/2017 - <a href="http://eu.democratandchronicle.com">eu.democratandchronicle.com</a> Naples Daily News, 09/01/2018 - <a href="http://eu.naplesnews.com">eu.naplesnews.com</a> Business and Human Rights, 24/05/2018 - <a href="http://business-humanrights.org">business-humanrights.org</a></li> <li>• Allegation: A 2017 investigation by USA Today alleged that truck drivers in the US supply chain for retailers including Target (CostCo and Home Depot) were often trapped in debt bondage and worked in conditions equivalent to forced labour. Specifically the drivers were said to be pressed into leasing trucks they could not afford, forced as a result to drive for up to 20 hours a day for pay that "sometimes drops to pennies on the hour", before being fired and having their vehicles taken, without compensation for the money the drivers had paid towards buying them. In 2018, the city of Los Angeles filed three lawsuits against some of the trucking companies named in the report.</li> </ul>
E(1).1	The Company has responded publicly to the allegation	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Public response available: The Company has responded on 24 May 2018 through a public statement available on Business and Human Rights Resource Center website. It stated 'Target appreciates the opportunity to provide input on proposals to address the labor practices by some drayage trucking companies at the ports of Los Angeles and Long Beach that were raised in recent news articles and shared by drivers who have testified about their personal experiences at the state capitol'. It also reiterates its various commitments, expectations and contractual obligations but does not however state whether it investigated the allegations with its own contractors nor whether it acknowledges or denies that its own contractors pressed drivers into leasing trucks, etc.</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Response goes into detail</li> </ul>
E(1).2	The Company has appropriate policies in place	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Company policies address the general issues raised</li> <li>• Not met: Policies apply to the type of business relationships involved</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Policies address the specific rights in question</li> </ul>
E(1).3	The Company has taken appropriate action	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Engages with affected stakeholders</li> <li>• Not met: Encourages linked business to engage affected stakeholders</li> <li>• Not met: Provides remedies to affected stakeholders</li> <li>• Not met: Has improved systems and engaged affected stakeholders: In its statement, the Company has indicated that 'we are committed to responsible business conduct and expect our suppliers to comply with our supplier standards and all applicable laws and regulations including those involving federal labor law, wage and hour requirements, and proper worker classification. These are not just expectations, but contractual obligations made clear in our contracts, supplier code of conduct, and supplier engagement standards. We encourage the Port</li> </ul>



Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>authorities and other stakeholders to explore appropriate measures aimed at extending similar protections at the Port's operations'. However, it has not indicated what actions it took as a result of the allegations such as, for example, identifying the risks, investigating into the allegations, auditing contactors, monitoring progress, engaging with affected stakeholders or press contractors to engage with affected stakeholders, etc.</p> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Remedies are satisfactory to the victims</li> <li>• Not met: Has improved systems and engaged affected stakeholders</li> </ul>

## F. Transparency (10% of Total)

Indicator Code	Indicator name	Score	Explanation
F.1	Company willingness to publish information	1.51 out of 4	Out of a total of 53 indicators assessed under sections A-D of the benchmark, Target made data public that met one or more elements of the methodology in 20 cases, leading to a disclosure score of 1.51 out of 4 points.
F.2	Recognised Reporting Initiatives	2 out of 2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Company reports on GRI: Its CSR Report indicates: 'The third section is organized by the Global Reporting Initiative (GRI) Standards and includes additional information on our most significant achievements and challenges in 2016, with links to more information on our corporate site.' [GRI Standards Content Index: <a href="http://corporate.target.com">corporate.target.com</a> &amp; Corporate Social Responsibility Report, 2016: <a href="http://corporate.target.com">corporate.target.com</a>]</li> </ul>
F.3	Key, High Quality Disclosures	0 out of 4	<p>Target met 0 of the 8 thresholds listed below and therefore gets 0 out of 4 points for the high quality disclosure indicator.</p> <p>Specificity and use of concrete examples</p> <ul style="list-style-type: none"> <li>• Not met: Score 2 for A.2.2 : Board discussions</li> <li>• Not met: Score 2 for B.1.6 : Monitoring and corrective actions</li> <li>• Not met: Score 2 for C.1 : Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers</li> <li>• Not met: Score 2 for C.3 : Users are involved in the design and performance of the channel(s)/mechanism(s)</li> </ul> <p>Discussing challenges openly</p> <ul style="list-style-type: none"> <li>• Not met: Score 2 for B.2.4 : Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts</li> <li>• Not met: Score 2 for C.7 : Remedying adverse impacts and incorporating lessons learned</li> </ul> <p>Demonstrating a forward focus</p> <ul style="list-style-type: none"> <li>• Not met: Score 2 for A.2.3 : Incentives and performance management</li> <li>• Not met: Score 2 for B.1.2 : Incentives and performance management</li> </ul>

### Disclaimer

A score of zero for a particular indicator does not mean that bad practices are present. Rather it means that we have been unable to identify the required information in public documentation.

See the 2018 Key Findings report for more details of the research process.

The Benchmark is made available on the express understanding that it will be used solely for general information purposes. The material contained in the Benchmark should not be construed as relating to accounting, legal, regulatory, tax, research or investment advice and it is not intended to take into account any specific or general investment objectives. The material contained in the Benchmark does not constitute a recommendation to take any action or to buy or sell or otherwise deal with anything or anyone identified or contemplated in the Benchmark. Before acting on anything contained in this material, you should consider whether it is suitable to your particular circumstances and, if necessary, seek professional advice. The material in the Benchmark has been put together solely according to the CHRB methodology and not any other assessment models in operation within any of the project partners or EIRIS Foundation as provider of the analyst team.

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As CHRB Ltd, we want to emphasise that the results will always be a proxy for good human rights management, and not an absolute measure of performance. This is because there are no fundamental units of measurement for human rights. Human rights assessments are therefore necessarily more subjective than objective. The Benchmark also captures only a snap shot in time. We therefore want to encourage companies, investors, civil society and governments to look at the broad performance bands that companies are ranked within rather than their precise score because, as with all measurements, there is a reasonably wide margin of error possible in interpretation. We also want to encourage a greater analytical focus on how scores improve over time rather than upon how a company compares to other companies in the same industry today. The spirit of the exercise is to promote continual improvement via an open assessment process and a common understanding of the importance of the UN Guiding Principles on Business and Human Rights.