

Company Name	Target
Industry	Agricultural Products & Apparel (Supply Chain only)
Overall Score (*)	21.3 out of 100

Theme Score	Out of	For Theme
2.3	10	A. Governance and Policies
1.6	25	B. Embedding Respect and Human Rights Due Diligence
2.1	15	C. Remedies and Grievance Mechanisms
7.7	20	D. Performance: Company Human Rights Practices
3.8	20	E. Performance: Responses to Serious Allegations
3.9	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 2019 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	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"> • Met: General HRs commitment: "Target respects individual human rights in every aspect of our business globally – from our supply chain to our stores, headquarters, operations and business partnerships, because we believe every person deserves to be treated with dignity and respect. We also follow all human rights laws that apply to our business." in addition the company also indicates that "We expect every team member and every business partner that works with us to show respect for human rights and follow all laws that protect human rights, including those that prohibit forced or compulsory labor, child labor and human trafficking." [Labor & Human Rights Policies: corporate.target.com & Target Corporation Code of Ethics, 03/19: corporate.target.com] • Not met: UNGC principles 1 & 2 • Not met: UDHR • Not met: International Bill of Rights <p>Score 2</p> <ul style="list-style-type: none"> • Not met: UNGPs • Not met: OECD
A.1.2	Commitment to respect the human rights of workers	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"> • Not met: ILO Core • Not met: UNGC principles 3-6 • Not met: Explicitly list All four ILO for AG suppliers: The vendor conduct guide's standards include most ILO core areas except collective bargaining. It explicitly

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>covers child labour, forced labour discrimination and freedom of association. In relation to this last issue 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’. No additional evidence found in the vendor code of conduct. [Vendor Conduct Guide, 2016: corporate.target.com & Vendor Code of Conduct, 2018: corporate.target.com]</p> <ul style="list-style-type: none"> • Not met: Explicitly list ALL four ILO for AP suppliers: See above [Vendor Conduct Guide, 2016: corporate.target.com & Vendor Code of Conduct, 2018: corporate.target.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Explicit commitment to 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, 1/8/18: corporate.target.com] • Met: Respect H&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, 1/8/18: corporate.target.com] • Met: H&S applies to AG suppliers: Regarding H&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: corporate.target.com & Vendor Code of Conduct, 2018: corporate.target.com] • Met: H&S applies to AP suppliers: See above [Vendor Conduct Guide, 2016: corporate.target.com & Vendor Code of Conduct, 2018: corporate.target.com] • Not met: working hours for workers • 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’. ‘Workers must have at least 1 full non-working day in every 7-day period’. [Vendor Conduct Guide, 2016: corporate.target.com & Vendor Code of Conduct, 2018: corporate.target.com]
A.1.3.AG.a	Commitment to respect human rights particularly relevant to the industry - land and natural resources (AG)	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"> • Not met: Respect land ownership and natural resources • Met: Respecting the right to water: On its website the Company states ‘In 2018, we introduced a freshwater stewardship approach that builds on our existing water management aspirations: At Target, we believe that clean, drinkable water and sanitation are human rights and should be accessible for all. Healthy ecosystems and sustainable water management are essential in the delivery of these basic rights.’ It adds ‘We created our freshwater stewardship approach and initial goals in partnership with World Wildlife Fund (WWF). They’re designed to help us deliver on the UN Sustainable Development Goals, and help us address three important issues in communities where we operate: improving water quality, optimizing water efficiency, increasing access to clean water. [Water, N/A: corporate.target.com] <ul style="list-style-type: none"> • Not met: Expecting suppliers to respect these rights: On its website the Company states ‘Water is important to the success of our business operations, from our supply chains to our stores and the communities within which we operate.’ ‘We’re proud to be the first retailer to join Ceres and the World Wildlife Fund’s AgWater Challenge, and make the following commitments to help preserve and protect freshwater resources in the global agricultural supply chain. ‘ However, there is no evidence that the Company expects its suppliers to make the same commitments to respecting the right to water. [Water, N/A: corporate.target.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Voluntary Guidelines on Tenure Rights • Not met: IFC Performance Standards • Not met: FPIC for all • Not met: Zero tolerance for land grabs • Not met: Respecting the right to water

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not met: Expecting suppliers to respect these rights
A.1.3.AG.b	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"> • Not met: Women's rights • Not met: Children's rights • Not met: Migrant worker's rights • Not met: Expects suppliers to respect these rights <p>Score 2</p> <ul style="list-style-type: none"> • Not met: CEDAW/Women's Empowerment Principles • Not met: Child Rights Convention/Business Principles • Not met: Convention on migrant workers • Not met: Expecting suppliers to respect these rights
A.1.3.AP	Commitment to respect human rights particularly relevant to the industry (AP)	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"> • Not met: Women's Rights • Not met: Children's Rights • Met: Migrant worker's rights: Labour & human rights polices include ‘Migrant Labor: We expect all workers, including foreign and domestic migrant workers, to be provided wages, benefits and working conditions that are fair, comparable to local workers and in accordance with local law. We do not condone holding workers’ passports or other personal documents, charging any type of fee or deposit for employment, allowing labor agents or brokers to charge fees or engaging in deceptive recruitment practices. We review these policies in detail during our audit process and expect our vendors to share these views and comply.’ [Labor & Human Rights Policies: corporate.target.com] • Met: Expecting suppliers to respect these rights: The Company states on its website that they are committed to respecting migrant workers’ rights (see above) and say that they ‘expect our vendors to share these views and comply.’ [Labor & Human Rights Policies: corporate.target.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: CEDAW/Women's Empowerment Principles • Not met: Child Rights Convention/Business principles • Not met: Convention on migrant workers • Not met: Respecting the right to water • Not met: Expecting suppliers to respect these rights
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"> • 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: corporate.target.com] • 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, 2018: corporate.target.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Commits to engage stakeholders in design • Not met: Regular stakeholder design engagement
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"> • Not met: Commits to remedy <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Not obstructing access to other remedies

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not met: Collaborating with other remedy initiatives • Not met: Work with AG suppliers to remedy impacts: The Company states on its website 'Grievances: Target expects suppliers to implement effective grievance mechanisms to resolve internal disputes and employee complaints. Legitimate and effective grievances procedures have legitimacy and are accessible, predictable, equitable, transparent, rights-compatible, confidential, based on engagement and dialogue, and are used as a source of continuous learning.' However, no evidence found of a commitment to work with suppliers to remedy adverse impacts caused or contributed to through the suppliers' own mechanism (or developing third party non-judicial remedies) [Labor & Human Rights Policies: corporate.target.com] • Not met: Work with AP suppliers to remedy impacts: See above [Labor & Human Rights Policies: corporate.target.com]
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"> • Not met: Zero tolerance attacks on HRs Defenders (HRDs) <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Expects AG suppliers to reflect company HRD commitments • Not met: Expects AP suppliers to reflect company HRD commitments

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"> • Met: CEO or Board approves policy: The Company's code of business conduct is signed by the Chairman & CEO and the Chief Risk Compliance officer. [Code of Business Conduct, 1/8/18: corporate.target.com] • 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, 10/15: investors.target.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Speeches/letters by Board members or CEO
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"> • Not met: Board/Committee review of salient HRs • Not met: Examples or trends re HR discussion <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both examples and process
A.2.3	Incentives and performance management	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"> • Not met: Incentives for at least one board member • Not met: At least one key AG HR risk, beyond employee H&S • Not met: At least one key AP HR risk, beyond employee H&S <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Performance criteria made public

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	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Commits to ILO core conventions: See indicator A.1.2 • Met: Senior responsibility for HR: In its CSR Report 2018, the Company indicates: 'Jennifer Silberman oversees corporate responsibility across Target as the Vice President of Corporate Responsibility'. Sustainability strategies and targets include human rights, particularly in the supply chain. She regularly reports to the Nominating and Governance Committee. [Corporate Social Responsibility Report 2018, 2018: corporate.target.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Day-to-day responsibility: Although there is a Corporate Responsibility team, no further details found on how it works day-to-day responsibility.

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • 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: corporate.target.com] • Not met: Day-to-day responsibility for AP in supply chain: See above
B.1.2	Incentives and performance management	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"> • Not met: Senior manager incentives for human rights • Not met: At least one key AG HR risk, beyond employee H&S • Not met: At least one key AP HR risk, beyond employee H&S <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Performance criteria made public
B.1.3	Integration with enterprise risk management	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"> • Not met: HR risks is integrated as 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, 10/15: investors.target.com & Annual Report, 2017: investors.target.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Audit Ctte or independent risk assessment
B.1.4.a	Communication /dissemination of policy commitment(s) within Company's own operations	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"> • Not met: Commits to ILO core conventions: See indicator A.1.2 • Not met: Communicates its policy to all workers in own operations <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Commits to all 4 ILO core conventions: See indicator A.1.2 • Not met: Communication of policy commitments to stakeholder • Not met: How policy commitments are made accessible to audience
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"> • Not met: Commits to all 4 ILO core conventions for suppliers: See A.1.2 • Not met: Communicating policy down the whole AG supply chain: The Company indicates in the Vendor Conduct guide that 'Because we place such a high priority on ethical and legal conduct, 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'. No evidence found, however, in relation to the Company communicating its policies down the supply chain (or requiring its suppliers to do so) [Vendor Code of Conduct, 2018: corporate.target.com & Responsible Sourcing: corporate.target.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Requiring AG suppliers to communicate policy down the chain • Not met: Communicating policy down the whole AP supply chain: The Company indicates in the Vendor Conduct guide that 'Because we place such a high priority on ethical and legal conduct, 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'. No evidence

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>found, however, in relation to the Company communicating its policies down the supply chain (or requiring its suppliers to do so) [Vendor Code of Conduct, 2018: corporate.target.com & Responsible Sourcing: corporate.target.com]</p> <ul style="list-style-type: none"> • Not met: Requiring AP suppliers to communicate policy down the chain: See above <p>Score 2</p> <ul style="list-style-type: none"> • Not met: How HR commitments made binding/contractual: See above • Not met: Including on AG suppliers: See above • Not met: Including on AP suppliers: See above
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"> • Not met: Scores at least 1 on A.1.2: See indicator A.1.2 • 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. [Responsible Sourcing: corporate.target.com] • Not met: Trains relevant AG managers including procurement • Not met: Trains relevant AP managers including procurement <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Score of 2 on A.1.2: See indicator A.1.2 • Not met: Both requirements under score 1 met
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"> • Not met: Scores at least 1 on A.1.2 • Not met: Monitoring implementation of HR policy commitments • 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. [Responsible Sourcing: corporate.target.com & Social Compliance Audit Process: corporate.target.com] • Not met: Monitoring AP suppliers: See above [Responsible Sourcing: corporate.target.com & Social Compliance Audit Process: corporate.target.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Score of 2 on A.1.2: See indicator A.1.2 • Not met: Describes corrective action process • Not met: Example of corrective action • Not met: Discloses % of AG supply chain monitored: Although the Company discloses in the CSR report 2018 quantitative data regarding audits, including that it performed 1,319 audits in 2017, it does not disclose the proportion of supply chain monitored. [Corporate Social Responsibility Report 2018, 2018: corporate.target.com] • Not met: Discloses % of AP supply chain monitored: See above
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"> • Met: HR affects AG selection of suppliers: The company indicates that "If you are responsible for selecting business partners, choose business partners who share our values and hold them to high ethical standards. Once an Owned Brand business partner is selected, the Responsible Sourcing team may monitor the business partner as part of their audit process to make sure they follow applicable laws and comply with our Standards of Vendor Engagement (SOVE). [...] However, it is not clear how it is actually taken into account in the selection process. [Responsible Sourcing: corporate.target.com & Target Corporation Code of Ethics, 03/19: corporate.target.com] • 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

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>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: corporate.target.com]</p> <ul style="list-style-type: none"> • Met: HR affects AP selection of suppliers: See above [Responsible Sourcing: corporate.target.com] • Met: HR affects on-going AP supplier relationships: See above [Social Compliance Audit Process: corporate.target.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirement under score 1 met • Not met: Working with AG suppliers to improve performance • Not met: Working with AP suppliers to improve performance
B.1.8	Approach to engagement with potentially affected stakeholders	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"> • Not 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. No evidence found, however, in relation to the systems or process for identifying affected stakeholders. [Corporate Social Responsibility Report 2018, 2018: corporate.target.com] • 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 (triggers). [Corporate Social Responsibility Report 2018, 2018: corporate.target.com] • Met: Workers in AG SC engaged: Including issues such as fair wages and benefits and worker well-being. [Corporate Social Responsibility Report 2018, 2018: corporate.target.com] • Met: Workers in AP SC engaged: See above [Corporate Social Responsibility Report 2018, 2018: corporate.target.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Analysis of stakeholder views and company's actions on them

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"> • 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.' No additional relevant evidence found in 2018 report. [Corporate Social Responsibility Report, 2016: corporate.target.com & Corporate Social Responsibility Report 2018, 2018: corporate.target.com] • 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: corporate.target.com & Corporate Social Responsibility Report 2018, 2018: corporate.target.com] • Not met: Identifying risks in AP suppliers: See above <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Ongoing global risk identification: See above • Not met: In consultation with stakeholders: See above • Not met: In consultation with HR experts: See above • Not met: Triggered by new circumstances • Not met: Explains use of HRIAs or ESIA (inc HR)
B.2.2	Assessing: Assessment of 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"> • Not met: Salient risk assessment (and context) • Not met: Public disclosure of salient risks

Indicator Code	Indicator name	Score (out of 2)	Explanation
	identified (salient risks and key industry risks)		Score 2 • Not met: Both requirements under score 1 met
B.2.3	Integrating and Acting: Integrating assessment findings internally and taking appropriate action	0	The individual elements of the assessment are met or not as follows: Score 1 • Not met: Action Plans to mitigate risks • Not met: Including in AG supply chain • Not met: Including in AP supply chain • Not met: Example of Actions decided Score 2 • Not met: Both requirements under score 1 met
B.2.4	Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts	0	The individual elements of the assessment are met or not as follows: Score 1 • Not met: System to check if Actions are effective • Not met: Lessons learnt from checking effectiveness Score 2 • Not met: Both requirement under score 1 met
B.2.5	Communicating : Accounting for how human rights impacts are addressed	0	The individual elements of the assessment are met or not as follows: Score 1 • Not met: Comms plan re identifying risks • Not met: Comms plan re assessing risks • Not met: Comms plan re action plans for risks • Not met: Comms plan re reviewing action plans • Not met: Including AG suppliers • Not met: Including AP suppliers Score 2 • Not met: Responding to affected stakeholders concerns • Not met: Ensuring affected stakeholders can access communications

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	The individual elements of the assessment are met or not as follows: Score 1 • 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, 1/8/18: corporate.target.com] Score 2 • Not met: Number grievances filed, addressed or resolved • 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, 1/8/18: corporate.target.com & EthicsPoint-Target: secure.ethicspoint.com] • Met: Opens own system to AG supplier workers: In its Vendor Code of Conduct the Company discloses the different channels available to report violations, all of which are from Target. It includes website, email, telephone and postal address. [Vendor Code of Conduct, 2018: corporate.target.com] • Met: Opens own system to AP supplier workers: As indicated above, the Company opens its own channels. [Vendor Conduct Guide, 2016: corporate.target.com & Vendor Code of Conduct, 2018: corporate.target.com]
C.2	Grievance channel(s)/mechanism(s) to receive complaints or concerns from external	0	The individual elements of the assessment are met or not as follows: Score 1 • 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

Indicator Code	Indicator name	Score (out of 2)	Explanation
	individuals and communities		<p>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'.</p> <p>The Company , however, does not indicate whether external individuals and communities can make use of these mechanism/channel. [Code of Business Conduct, 1/8/18: corporate.target.com & Target Integrity Hotline: targetintegrityhotline.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • 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: secure.ethicspoint.com] • Not met: Expects AG supplier to have community grievance systems • Not met: AG supplier communities use global system: See above • Not met: Expects AP supplier to have community grievance systems • Not met: AP supplier communities use global system: See above
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"> • Not met: Engages users to create or assess system • Not met: Description of how they do this <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Engages with users on system performance • Not met: Provides user engagement example on performance • Not met: AG suppliers consult users in creation or assessment • Not met: AP suppliers consult users in creation or assessment
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"> • 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.' <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, 1/8/18: corporate.target.com]</p> <ul style="list-style-type: none"> • 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, 1/8/18: corporate.target.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Escalation to senior/independent level: See above [Code of Business Conduct, 1/8/18: corporate.target.com]
C.5	Commitment to non-retaliation over complaints or concerns made	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"> • 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, 1/8/18: corporate.target.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • 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, 1/8/18: corporate.target.com] Score 2 <ul style="list-style-type: none"> • Not met: Has not retaliated in practice • Not met: Expects AG suppliers to prohibit retaliation • Not met: Expects AP suppliers to prohibit retaliation
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"> • Not met: Won't impede state based mechanisms • Not met: Complainants not asked to waive rights Score 2 <ul style="list-style-type: none"> • Not met: Will work with state based or non judicial mechanisms • Not met: Example of issue resolved (if applicable)
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"> • Not met: Describes how remedy has been provided • Not met: Says how it would remedy key sector risks Score 2 <ul style="list-style-type: none"> • Not met: Changes introduced to stop repetition • Not met: Approach to learning from incident to prevent future impacts • Not met: Evaluation of the channel/mechanism

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"> • 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, no evidence found in relation to whether it should cover basic needs of both employee and his/her family and provide discretionary income. [Vendor Code of Conduct, 2018: corporate.target.com & Social Compliance Audit Process: corporate.target.com] Score 2 <ul style="list-style-type: none"> • Not met: Improving living wage practices of suppliers [Vendor Conduct Guide, 2016: corporate.target.com & Vendor Code of Conduct, 2018: corporate.target.com] • Not met: Both requirements under score 1 met • Not met: Provides analysis of trends demonstrating progress
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"> • Not met: Avoids business model pressure on HRs (purchasing practices) • 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: corporate.target.com] Score 2 <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met

Indicator Code	Indicator name	Score (out of 2)	Explanation
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"> 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: corporate.target.com] <p>Score 2</p> <ul style="list-style-type: none"> 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. <p>No additional evidence found in the latest version of the Factory list. [Factory list, July 2019: corporate.target.com]</p>
D.1.4.b	Prohibition on 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"> 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 Code of Conduct, 2018: corporate.target.com & Labor & Human Rights Policies: corporate.target.com] 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, 2018: corporate.target.com & Good Wave label: goodweave.org] <p>Score 2</p> <ul style="list-style-type: none"> Not met: Both requirements under score 1 met Not met: Analysis of trends in progress made
D.1.5.b	Prohibition on 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"> 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 & Human Rights Policies: corporate.target.com] Met: How working with suppliers on debt & 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, 2018: corporate.target.com] <p>Score 2</p> <ul style="list-style-type: none"> Met: Both requirements under score 1 met Not met: Analysis of trends in progress made

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.1.5.d	Prohibition on 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"> • 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 & 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 Code of Conduct, 2018: corporate.target.com & Labor & Human Rights Policies: corporate.target.com] • 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, 2018: corporate.target.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Both requirements under score 1 met • Not met: Provides analysis of trends demonstrating progress
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"> • Not met: FoA & CB rules in codes or contracts: The Company indicates in the Vendor Code of Conduct that "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." However as explained in previous indicators no evidence has been found of a commitment to not interfere in the right to collectively bargain. [Vendor Conduct Guide, 2016: corporate.target.com & Vendor Code of Conduct, 2018: corporate.target.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: How working with suppliers on FoA and CB • Not met: Both requirements under score 1 met • Not met: Provides analysis of trends demonstrating progress
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"> • 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 Code of Conduct, 2018: corporate.target.com & Labor & Human Rights Policies: corporate.target.com] • 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, 2018: corporate.target.com] • Not met: Lost days or near miss disclosures: See above [Corporate Social Responsibility Report 2018, 2018: corporate.target.com] • Not met: Fatalities disclosure: See above [Corporate Social Responsibility Report 2018, 2018: corporate.target.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> • Met: How working with suppliers on H&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, 2018: corporate.target.com] • Not met: Provides analysis of trends demonstrating progress
D.1.8.b	Land rights: Land acquisition (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"> • Not met: Rules on land & owners in codes or contracts • Not met: How working with suppliers on land issues <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met • Not met: Provides analysis of trends demonstrating progress
D.1.9.b	Water and sanitation (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"> • Not met: Rules on water stewardship in codes or contracts • Met: How working with suppliers on water stewardship issues: The Company collaborated in 2017 with WWF to assess water reduction efforts including the supply chain. Actions 'are intended to contribute to improved water quality, quantity and access' through a focus on different areas including raw materials and manufacturing. In relation to raw materials the company is working to 'better understand our basin-level impacts to prioritize our responses'. In manufacturing, the Company plans to 'do more with less water – especially where local conditions demand. Looking across our product supply chains, we want wastewater leaving our vendor's facilities to be of quality that could be safely used as drinking water'. [Corporate Social Responsibility Report 2018, 2018: corporate.target.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met • Not met: Provides analysis of trends demonstrating progress
D.1.10.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"> • Not met: Women's rights in codes or contracts: In its Standards of Vendor Engagement, section of the Vendor Code of Conduct, 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, the 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. <p>No additional evidence found in the 2018 Vendor Code of Conduct [Vendor Conduct Guide, 2016: corporate.target.com & Vendor Code of Conduct, 2018: corporate.target.com]</p> <ul style="list-style-type: none"> • 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, 2018: corporate.target.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met • Not met: Provides analysis of trends demonstrating progress

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"> • 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, no evidence found in relation to whether it should cover basic needs of both employee and his/her family and provide discretionary income. [Vendor Code of Conduct, 2018: corporate.target.com & Social Compliance Audit Process: corporate.target.com] • Not met: Improving living wage practices of suppliers <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met • Not met: Provide analysis of trends demonstrating progress
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"> • Not met: Avoids business model pressure on HRs • 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: corporate.target.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met
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"> • Met: Identifies suppliers back to product source: 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: corporate.target.com] <p>Score 2</p> <ul style="list-style-type: none"> • 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. No additional evidence found in the latest version of the factory list. [Factory list, July 2019: corporate.target.com]
D.2.4.b	Prohibition on 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"> • 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 Code of Conduct, 2018: corporate.target.com & Labor & Human Rights Policies: corporate.target.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • 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, 2018: corporate.target.com & Good Wave label: goodweave.org] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Both requirements under score 1 met • Not met: Provide analysis of trends demonstrating progress
D.2.5.b	Prohibition on 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"> • 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 & Human Rights Policies: corporate.target.com] • Met: How working with suppliers on debt & 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, 2018: corporate.target.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Both requirements under score 1 met • Not met: Provide analysis of trends in progress made
D.2.5.d	Prohibition on 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"> • 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 & 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 Code of Conduct, 2018: corporate.target.com & Labor & Human Rights Policies: corporate.target.com] • 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, 2018: corporate.target.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Both requirements under score 1 met • Not met: Provide analysis of trends in progress made

Indicator Code	Indicator name	Score (out of 2)	Explanation
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"> • Not met: FoA & CB rules in codes or contracts: The Company indicates in the Vendor Code of Conduct that "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." However as explained in previous indicators no evidence has been found of a commitment to not interfere in the right to collectively bargain. [Vendor Code of Conduct, 2018: corporate.target.com] • Not met: How working with suppliers on FoA and CB <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met • Not met: Provide analysis of trends in progress made
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"> • 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 Code of Conduct, 2018: corporate.target.com & Labor & Human Rights Policies: corporate.target.com] • 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, 2018: corporate.target.com] • Not met: Lost days or near miss disclosures: See above [Corporate Social Responsibility Report 2018, 2018: corporate.target.com] • Not met: Fatalities disclosures: See above [Corporate Social Responsibility Report 2018, 2018: corporate.target.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: How working with suppliers on H&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, 2018: corporate.target.com] • Not met: Provide analysis of trends in progress made
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"> • 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, the 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: corporate.target.com & Vendor Code of Conduct, 2018: corporate.target.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • 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, 2018: corporate.target.com] Score 2 • Not met: Both requirement under score 1 met • Not met: Provide analysis of trends in progress made
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"> • 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'. <p>No additional evidence found in the 2018 report [Vendor Conduct Guide, 2016: corporate.target.com & Vendor Code of Conduct, 2018: corporate.target.com]</p> <ul style="list-style-type: none"> • Not met: How working with suppliers on working hours Score 2 • Not met: Both requirements under score 1 met • Not met: Provide analysis of trends in progress made

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"> • Headline: Crushing Debt Bondage Poses Forced Labor Risk for U.S. Port Truckers and Retailers using them • Area: Forced labour • Story: A 2017 investigation by USA Today alleged that truck drivers in the US supply chain for retailers including Costco (Target 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. • Sources: [Huffington Post, 21/11/2017 -: huffingtonpost.com][USA Today, 09/01/18: eu.usatoday.com][USA Today, 16/06/2017 -: usatoday.com][Business and Human Rights, 24/05/2018 -: business-humanrights.org]
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"> • 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. Score 2 • Not met: Response goes into detail
E(1).2	The Company has appropriate policies in place	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"> • Met: Company policies address the general issues raised: in the LB Tidelands and Harbor Committee statement on this issue, the company states that «[. . .] Target does not tolerate mistreatment of workers within our team, suppliers, subcontractors or anyone that does business with our company. We are committed to responsible business conduct and expect our suppliers to comply with our supplier standards and all applicable laws and regulation including those

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>involving federal labor law, wage and hour requirements, and proper worker classification.</p> <ul style="list-style-type: none"> • Met: Policies apply to the type of business relationships involved: This is applicable to suppliers as well <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Policies address the specific rights in question
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"> • Not met: Engages with affected stakeholders • Not met: Encourages linked business to engage affected stakeholders • Not met: Provides remedies to affected stakeholders • Not met: Has reviewed management systems to prevent recurrence: 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 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 contractors, monitoring progress, engaging with affected stakeholders or press contractors to engage with affected stakeholders, etc. <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Remedies are satisfactory to the victims • Not met: Has improved systems and engaged affected stakeholders
E(2).0	Serious allegation No 2		<ul style="list-style-type: none"> • Headline: Twelve Tribe's Common Sense Farm linked of child labor in Cambridge, US • Area: Child labour • Story: The New York State Department of Labor found multiple violations of state child labour laws and abuse occurring at the Common Sense Farm in Washington County, New York, USA. The farm and production center location of religious sect 'Twelve Tribes' supplies soaps and skincare products to supermarkets including Walmart, Target, Amazon and Whole Foods. • Sources: [Times Union - 06/06/2018: dailymail.co.uk][Inside Edition - 01/06/2018: insideedition.com]
E(2).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"> • Not met: Public response available: Target does not appear to have released a public statement concerning the allegation. <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Response goes into detail
E(2).2	The Company has appropriate policies in place	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"> • Met: Company policies address the general issues raised: Target states that it has a "...zero-tolerance policy for underage labor." Target also states that in cases where child labor is found, the company will not accept any merchandise in production." [Labor & Human Rights Policies: corporate.target.com] • Met: Policies apply to the type of business relationships involved: Target policies dictate that it will not tolerate the use of underage labor and will not knowingly work with suppliers that utilize underage workers. According to the company, an underage worker is any individual younger than the local minimum working age or the age of 15, whichever older, and/or those not abiding by the international standards as defined by the International Labor Organization (ILO) regarding age appropriate work governing family farming. 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. [Standards of vendor engagement: corporate.target.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Policies address the specific rights in question: As part of its auditing process, Target performs in-depth records and personnel file reviews and conducts employee interviews. If it finds underage labor at any factory, Target immediately reviews all aspects of the situation, and where possible, works with a credible 3rd party expert to develop and implement a comprehensive remediation plan in line with internationally defined best practices. If the remediation is unsuccessful or not possible, Target deactivates the factory for non-compliance. In all cases, Target does not accept any merchandise in production. Additionally, Target will partner

Indicator Code	Indicator name	Score (out of 2)	Explanation
			with Better Work and Goodweave in countries where they operate to systematically address underage labor and remediate cases of underage labor when found in the apparel and rug industries, respectively. [Labor & Human Rights Policies: corporate.target.com]
E(2).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"> • Not met: Engages with affected stakeholders: Company does not appear to have engaged with the affected stakeholders. • Not met: Encourages linked business to engage affected stakeholders: There is no evidence that Target has encouraged linked business to engage the affected stakeholders. • Not met: Provides remedies to affected stakeholders: The company has not provided any sort of remedies, but press reports suggest that the company has looking into the issue. • Not met: Has reviewed management systems to prevent recurrence: The company has not reviewed any management systems in response to the allegations. <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Remedies are satisfactory to the victims: The company has not provided any form of remedy to the victims. • Not met: Has improved systems and engaged affected stakeholders: The company does not appear to have improved systems or engaged any of the affected stakeholders.

F. Transparency (10% of Total)

Indicator Code	Indicator name	Score	Explanation
F.1	Company willingness to publish information	1.89 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 25 cases, leading to a disclosure score of 1.89 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"> • Met: Company reports on GRI: The Corporate responsibility report includes a GRI index [Corporate Social Responsibility Report 2018, 2018: corporate.target.com]
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"> • Not met: Score 2 for A.2.2 : Board discussions • Not met: Score 2 for B.1.6 : Monitoring and corrective actions • Not met: Score 2 for C.1 : Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers • Not met: Score 2 for C.3 : Users are involved in the design and performance of the channel(s)/mechanism(s) <p>Discussing challenges openly</p> <ul style="list-style-type: none"> • Not met: Score 2 for B.2.4 : Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts • Not met: Score 2 for C.7 : Remedying adverse impacts and incorporating lessons learned <p>Demonstrating a forward focus</p> <ul style="list-style-type: none"> • Not met: Score 2 for A.2.3 : Incentives and performance management • Not met: Score 2 for B.1.2 : Incentives and performance management

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 2019 Key Findings report and technical annex for more details of the research process.

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As CHR B 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.