

Corporate Human Rights Benchmark 2022 Company Scoresheet



Company Name Target Corporation

Industry Agricultural Products & Apparel (Supply Chain only)

Overall Score 17.5 out of 100

Theme Score	Out of	For Theme
2.1	10	A. Governance and Policies
2.4	25	B. Embedding Respect and Human Rights Due Diligence
5.5	20	C. Remedies and Grievance Mechanisms
4.0	25	D. Performance: Company Human Rights Practices
3.5	20	E. Performance: Responses to Serious Allegations

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 2022 Methodology document for the sector concerned. 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	2	The individual elements of the assessment are met or not as follows: Score 1 • Met: General HRs commitment: The Human Rights statement indicates that 'we are committed to respecting human rights throughout our operations'. [Human Rights Statement (web), N/A: corporate.target.com] & [Code of Ethics, 06/2021: corporate.target.com] Score 2 • Met: Commitment to the UNGPs: It indicates: 'In alignment with the UN Guiding Principles on Business and Human Rights, we respect human rights and seek to avoid adverse human rights impacts resulting from our business activities'. [Human Rights Statement (web), N/A: corporate.target.com] • Not Met: Commitment to the OECD Guidelines for Multinational Enterprises
A.1.2.a	Commitment to respect the human rights of workers: ILO Declaration on Fundamental Principles and Rights at Work	0.5	The individual elements of the assessment are met or not as follows: Score 1 • Met: Company has a commitment to the ILO Core: It indicates: 'In line with the Universal Declaration of Human Rights and the International Labor Organization Core Conventions, we are committed to respecting human rights throughout our operations'. [Human Rights Statement (web), N/A: corporate.target.com] • Not Met: Company has a explicit commitment to All four ILO Core: The Code of Ethics states: 'We expect every team member and business partner 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'. Also: 'Discrimination based on protected status is illegal and it goes against everything Target stands for. The Human Rights Statement indicates: 'We believe that engaging directly is the best way to meet our team members' needs, as we respect the rights of workers to make an informed decision as to whether or not to

Indicator Code	Indicator name	Score (out of 2)	Explanation
			associate with any group, consistent with all applicable laws'. However, it is not clear the Company respects workers rights to bargain collectively. Moreover, it is not clear whether it is committed to respect the right to freedom of association in all contexts and locations (i.e. alternative mechanisms for those countries where there are legal restrictions to the exercise of these rights), as the Company indicates that it respects these rights 'consistent with all applicable laws'. [Code of Ethics, 06/2021: corporate.target.com] & [Human Rights Statement (web), N/A: corporate.target.com] Score 2 Not Met: Company expect suppliers to commit to ILO Core Not Met: Company explicitly list All four ILO for suppliers: The Business Partner Code of Conduct covers: No Forced Labour or Human Trafficking, No Underage Labour, No Discrimination. Regarding the right to freedom of association, it 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'. However, it is not clear it expects suppliers to respect the right to collective bargaining. Moreover, it is not clear whether the Company requires to respect those rights in all contexts, as it indicates 'consistent with all applicable laws'. In these cases (companies referring to local laws in freedom of association and collective bargaining), companies are expected to require alternative mechanisms or equivalent workers bodies where the right to freedom of association and collective bargaining is restricted under law. [Business
A.1.2.b	Commitment to respect the human rights of workers: Health and safety and working hours	0.5	Partner Code of Conduct, N/A: corporate.target.com] The individual elements of the assessment are met or not as follows: Score 1 • Met: Commitment to respect H&S of workers: The Code of Ethics indicates: 'We want to maintain a safe and secure work environment for our team members, contractors and business partners and a safe shopping environment for our guests. This requires each team member to commit to being a safety advocate at all times and to follow all laws, safety procedures and the Occupational Safety and Health Administration (OSHA) standards'. The HR Statement indicates that 'we're committed to providing a safe environment for both team members and guests, with dedicated safety programs to reduce or eliminate workplace hazards, including our Injury and Illness Protection Program' [Code of Ethics, 06/2021: corporate.target.com] • Not Met: Respect ILO labour standards on working hours or Commits to 48 hours regular work week Score 2 • Met: Expect suppliers to commit to H&S of their workers: 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'. [Business Partner Code of Conduct, N/A: corporate.target.com] & [Standards of Vendor Engagement on web, N/A: corporate.target.com] • Met: Expect suppliers to commit to ILO labour standard or to 48 hours regular work week: It indicates 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. Only in exceptional cases may working hours exceed 60 per week. Overtime work must always be voluntary and paid at a premium rate'. [Business Partner Code of Conduct, N/A: corporate.target.com]
A.1.3.a.AG	Commitment to respect human rights particularly relevant to the industry – land, natural resources and indigenous peoples' rights (AG)	0	The individual elements of the assessment are met or not as follows: Score 1 • Not Met: Respect land ownership and natural resources as set out in VGGT • Not Met: Respect land ownership and natural resources as set out in The IFC Performance Standards • Not Met: Respecting indigenous peoples' rights or ILO Convention No.169 or UN Declaration • Not Met: Expecting suppliers to make these commitments Score 2 • Not Met: Respecting the right to water: The Company has provided additional sources to CHRB regarding this indicator, where it indicates its many provisions for water management. However, no available policy statement committing it to respecting the right to water found. According to CHRB, standards the Company is expected to provide a formal statement of commitment in a policy document.

Indicator Code	Indicator name	Score (out of 2)	Explanation
			Not Met: Company's policy commits to obtain FPIC Not Met: Expecting suppliers to make these commitments: It indicates on its Human Rights Statement: 'We will do our part to validate that clean, drinkable water and sanitation are accessible for the workers in Target's supply chain'. According to the website section Standards of Vendor Engagement: 'Suppliers must identify, characterize and inventory all wastewater streams on an ongoing basis. In addition, suppliers must install and maintain appropriately sized wastewater treatment systems to ensure pollutants are at or below legally required levels. We will not tolerate suppliers with undersized, bypassed or inoperable wastewater treatment systems'. However, no reference found to refraining from negatively affecting access to safe water beyond waste-related issues (i.e sufficient water availability). Also, no evidence found that the Company expects suppliers to commits obtain the free prior and informed consent (FPIC). [Human Rights Statement (web), N/A: corporate.target.com] & [Standards of Vendor Engagement on web, N/A: corporate.target.com]
A.1.3.b.AG	Commitment to respect human rights particularly relevant to the industry – vulnerable groups (AG)	0.5	The individual elements of the assessment are met or not as follows: Score 1 Not Met: Women's rights: The Company indicates that: 'We are committed to respecting the human rights of workers within Target's supply chain, especially atrisk groups including women, young workers and foreign contract workers'. However, no details found of commitment regarding its own operations. [Human Rights Statement (web), N/A: corporate.target.com] Not Met: Children's rights Not Met: Migrant worker's rights: The Company indicates that: 'We are committed to respecting the human rights of workers within Target's supply chain, especially at-risk groups including women, young workers and foreign contract workers'. However, no details found of commitment regarding its own operations. Previous assessment used evidence from the website section 'Labour & human rights polices', which no longer seems to be available. [Human Rights Statement (web), N/A: corporate.target.com] Met: Expects suppliers to respect at least one of these rights: The Supply Chain Labor and Human Rights Policy indicates: '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'. [Supply Chain Labor & Human Rights on web, N/A: corporate.target.com] Score 2 Not Met: CEDAW/Women's Empowerment Principles Not Met: Child Rights Convention/Business Principles Not Met: Expecting suppliers to respect these rights
A.1.3.AP	Commitment to respect human rights particularly relevant to the industry – vulnerable groups (AP)	0.5	The individual elements of the assessment are met or not as follows: Score 1 Not Met: Women's rights: The Company indicates that: 'We are committed to respecting the human rights of workers within Target's supply chain, especially atrisk groups including women, young workers and foreign contract workers'. However, no details found of commitment regarding its own operations. [Human Rights Statement (web), N/A: corporate.target.com] Not Met: Children's rights Not Met: Migrant worker's rights: The Company indicates that: 'We are committed to respecting the human rights of workers within Target's supply chain, especially at-risk groups including women, young workers and foreign contract workers'. However, no details found of commitment regarding its own operations. Previous assessment used evidence from the website section 'Labour & human rights polices', which no longer seems to be available. [Human Rights Statement (web), N/A: corporate.target.com] Met: Expects suppliers to respect these rights: The Supply Chain Labor and Human Rights Policy indicates: '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

Indicator Code	Indicator name	Score (out of 2)	Explanation
			views and comply'. [Supply Chain Labor & Human Rights on web, N/A:
			<u>corporate.target.com</u>]
			Score 2
			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.1.4	Commitment to remedy		The individual elements of the assessment are met or not as follows: Score 1
		0	 Not Met: The Company commits to remedy: The Company states in its Human Rights Statement that 'In alignment with the UN Guiding Principles on Business and Human Rights, we respect human rights and seek to avoid adverse human rights impacts resulting from our business activities. We are continuously working to do better, but if there are adverse impacts, our approach is to provide access to effective remedy'. However, it is not clear that the Company is formally committing to remedy, since the provision of access to remediation is its 'approach'. [Human Rights Statement (web), N/A: corporate.target.com] Not Met: Company expect suppliers to make this commitment Score 2 Not Met: Collaborating with other remedy initiatives: Regarding its zero-tolerance policy for underage labour, the Supply Chain Labor & Human Rights Policies states that: 'we also partner with Better Work and GoodWeave in countries where they operate to systematically address underage labour and remediate cases of underage labour when found in the apparel and rug industries, respectively'. However, no commitment found to collaborating with judicial or non-judicial mechanisms to provide access to remedy beyond apparel and rug industries. [Supply Chain Labor & Human Rights on web, N/A: corporate.target.com] Not Met: Work with suppliers to remedy impact
A.1.5	Commitment to respect the		The individual elements of the assessment are met or not as follows: Score 1
	rights of human	0	Not Met: Zero tolerance attacks on HRs Defenders (HRDs)
	rights		Not Met: Company expect suppliers to make this commitment
	defenders		Score 2
	uerenuers		Not Met: Work with HRD to create safe and enabling environment

A.2 Policy Commitments (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.2.1	Commitment from the top	0.5	The individual elements of the assessment are met or not as follows: Score 1 • Met: Board level responsibility for HRs: The Company indicates that 'Target's board of directors has delegated corporate responsibility oversight to the Nominating and Governance Committee. The vice president of Corporate Responsibility and the Corporate Responsibility team [] regularly report to and seek input from the Nominating and Governance Committee on those matters, including review of our annual Corporate Responsibility Report. The vice president of Corporate Responsibility presents to the Nominating and Governance Committee semi-annually on corporate responsibility-related topics. Additionally, new board members participate in an orientation program that includes corporate responsibility priorities and progress'. This includes human rights topics. [Corporate Social Responsibility Report 2019, 2019] • Not Met: Describe HR expertise of Board member Score 2 • Not Met: Speeches/letters by Board members or CEO
A.2.2	Board responsibility	0	The individual elements of the assessment are met or not as follows: Score 1 Not Met: Board/Committee review HRs strategy Not Met: Examples/trends re HR discussion in the last reporting period Score 2 Not Met: Meets both requirements under score 1 Not Met: How affected stakeholders/HR experts informed discussions
A.2.3	Incentives and performance management	0	The individual elements of the assessment are met or not as follows: Score 1 Not Met: Incentives for at least one board member Not Met: At least one key HR risk, beyond employee H&S Score 2 Not Met: Performance criteria made public Not Met: Review of other board performance criteria

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.2.4	Business model strategy and risks	0	The individual elements of the assessment are met or not as follows: Score 1 Not Met: Board process to review bussiness model and strategy Not Met: Describe frequency and triggers for reviewing Score 2 Not Met: Meets both requirements under score 1 Not Met: Example of actions decided

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	The individual elements of the assessment are met or not as follows: Score 1 Not Met: Score of 1 on A.1.2.a: See indicator A1.2 Met: Senior responsibility for HR implementation and decision making: The 2021 CSR Report indicates that: 'Our Senior Vice President, Corporate Responsibility has executive oversight of our human rights commitments'. [2021 Corporate Responsibility Report, N/A: corporate.target.com] Score 2 Met: How it assigns Day-to-day responsibility: Also: 'day-to-day implementation is led by multiple teams throughout Target that are supported by a cross-functional task force that reviews and addresses emerging issues as needed'. [2021 Corporate Responsibility Report, N/A: corporate.target.com] Not Met: Day-to-day resources and expertise allocation in own ops Not Met: Resources and expertise allocation in the supply chain
B.1.2	Incentives and performance management	0	The individual elements of the assessment are met or not as follows: Score 1 Not Met: Senior manager incentives for human rights Not Met: At least one key HR risk, beyond employee H&S Score 2 Not Met: Performance criteria made public Not Met: Review of other senior management performance
B.1.3	Integration with enterprise risk management	0	The individual elements of the assessment are met or not as follows: Score 1 Not Met: HR risks is integrated as part of enterprise risk system Not Met: Provides an example Score 2 Not Met: Audit Ctte or independent risk assessment
B.1.4.a	Communication /dissemination of policy commitment(s) to workers and external stakeholders	0	The individual elements of the assessment are met or not as follows: Score 1 Not Met: Score of 1 on A.1.2.a: See indicator A.1.2 Not Met: Communicates its policy to all workers in own operations: The Human Rights Statement indicates: 'We will develop and implement training on this policy for relevant Target team members'. However, it is not clear how it communicates its policy commitment to all its workers, including in local languages where necessary. [Human Rights Statement (web), N/A: corporate.target.com] Score 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	The individual elements of the assessment are met or not as follows: Score 1 Not Met: Meets ILO requirement for suppliers on A.1.2.a: See indicator A.1.2 Not Met: Steps to communicate policy commitments to supply chain: It indicates: Because we place such a high priority on ethical and legal conduct, we require all of our business partners to read, understand and comply with all expectations outlined in the Business Partner Code of Conduct and all Target requirements. Additionally, we expect our business partners engaged in manufacturing to ensure all of their factories understand and comply with the expectations outlined in the Standards of Vendor Engagement (SOVE)'. However, it is not the steps it takes to communicate its human rights policy down its supply chain itself. [Business Partner Code of Conduct, N/A: corporate.target.com] & [Responsible Sourcing (OLD PAGE), N/A: corporate.target.com] Not Met: Requires suppliers to communicate policy requirements Score 2 Not Met: How HR commitments made binding/contractual Not Met: Company requires suppliers to cascade down to their suppliers

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.5	Indicator name Training on Human Rights	Score (out of 2) 0.5	The individual elements of the assessment are met or not as follows: Score 1 Not Met: Scores at least 1 on A.1.2.a: See indicator A.1.2.a Not Met: How workers are trained on HR policy commitments: In its CSR Report 2019, the Company indicates: 'All team members also participate in a formal performance review process once a year, and receive annual training on critical issues, such as safety and security, compliance, ethics and integrity, and information security'. Moreover, the CSR 2021 indicates: 'Target provides team members guidance on ethics and the compliance responsibilities relevant to their roles. Delivered at new hire onboarding and annually, our mandatory ethics and compliance trainings are one of the ways we reinforce expectations for every team member. Beyond core ethics, our approximately 170 compliance trainings cover a wide range of key obligations and behaviors (). We also train on employment compliance topics, including wage and hour, discrimination and harassment, and health and safety. Training is tailored to Target's specific operations and team functions'. However, it is not clear if workers are generally trained on its human rights policy commitments. The Company has provided comments to CHRB regarding this indicator. However, no description found of how its workers, in general, are trained on its human rights policy commitment. The evidence it provided dealt with key business areas receiving specific training. [Corporate Social Responsibility Report 2019, 2019] & [2021 Corporate Responsibility Report, N/A: corporate.target.com] Met: Trains relevant managers including procurement: It indicates, in its CA Transparency in Supply Chains Act: 'Target administers mandatory training for team members responsible for sourcing and merchandising decisions on an array of topics, including Target's Standards'. Moreover, the webpage section notes: 'In 2022, we rolled out our first human rights training to key business areas including merchandising, owned brands, sourcing and corporate responsibil
			performance teams, supervisory skills, workplace communication, negotiation skills and grievance mechanisms'. According to the 2021 CSR Report: 'Target's Responsible Sourcing Advisory Program provides training and data tools focused on grievance mechanisms so that suppliers can establish and execute effective systems and monitor their progress'. However, it is not clear it has a general human rights training (policy commitments) conducted for suppliers. [2021 Corporate Responsibility Report, N/A: corporate.target.com] & [Responsible Sourcing Audit Program (web), N/A: corporate.target.com]
B.1.6	Monitoring and corrective		The individual elements of the assessment are met or not as follows: Score 1 • Not Met: Scores at least 1 on A.1.2.a
	actions	0.5	Not Met: Scores at least 1 of A.1.2.a Not Met: Monitoring implementation of HR policy commitments across global ops and supply chain: It indicates: 'We work to ensure that products we sell are made with respect for the rights of the men and women who make them, using contracts, audits and other relevant means to check compliance with our values'. However, it is not clear how it monitors the implementation of its human rights

Indicator Code	Indicator name	Score (out of 2)	Explanation
			policy commitments across its global operations. [2021 Corporate Responsibility Report, N/A: corporate.target.com] • Not Met: Proportion of supply chain monitored: Regarding its auditing process, it indicates: 'The risk-based program assesses facility conditions, worker treatment and compensation, hiring processes, environmental practices and compliance with applicable laws and Target's SOVE. All disclosed manufacturing locations must conduct an audit that is approved as part of Target's industry-aligned audit protocol on a regular basis. Target maintains the right to conduct unannounced audits of any disclosed locations. () Target has adopted the Social & Labor Convergence Program (SLCP), Better Work, Sedex Members Ethical Trade Audit (SMETA), amfori BSCI, the ICTI Ethical Toy Program, Responsible Business Alliance (RBA) and Higg facility tools to drive industry convergence, help drive supply chain performance and drive continuous improvement. Target's Responsible Sourcing and Sustainability team reviews every audit and assigns a rating based on the findings presented'. It is not clear, however, the proportion of supply chain monitored (including both agricultural and apparel suppliers), as it seems to refer to 'manufacturing locations'. [2021 Corporate Responsibility Report, N/A: corporate.target.com] • Not Met: Describe how workers are involved in monitoring Score 2 • Not Met: Score of 2 on A.1.2.a • Met: Describes corrective action process: It indicates: 'Target believes in supporting vendors' continuous improvement in responsible sourcing performance. As part of our continuous improvement program, Target communicates audit results to our vendors and factories and requires a detailed corrective and preventative action plan (CAPA). Our responsible sourcing team has ongoing discussions with suppliers as they address the CAPA requirements, focusing on steps taken, required timelines, factory accountability for ongoing monitoring, and long-term stability planning. An important part of this process is hel
B.1.7	Engaging and		Sourcing Audit Program (web), N/A: corporate.target.com • Not Met: Disclose findings and number of corrective action The individual elements of the assessment are met or not as follows:
	terminating business relationships	0.5	• Not Met: HR affects selection of suppliers: In its Code of Ethics, the Company requests its team members to 'Ensure positive partnerships. Choose business partners who share our values and demonstrate an ongoing commitment to human rights. It's up to you to hold business partners accountable to our high ethical standards'. However, it is not clear how it is actually taken into account in the selection process. [Code of Ethics, 06/2021: corporate.target.com] • Met: HR affects on-going supplier relationships: The CSR Report indicates that 'We prioritize remediation and continuous improvement efforts but noncompliant audits may result in the cancellation of purchase orders and the termination of the business relationship. Target will only allow a vendor to use a previously noncompliant factory once the deactivation period has expired and the factory has demonstrated compliance with Target's SOVE and applicable laws'. Also, the website states that: 'If a vendor shows a pattern of producing products in facilities that do not meet our standards, they will be put on probation. During that time, they will work closely with our responsible sourcing team until they have elevated their internal program. During probation, we will monitor them closely and require that all audit results demonstrate facility compliance. If they are not able to consistently meet these requirements, we will remove them from our vendor matrix. We also will terminate a relationship with a vendor or factory if they attempt to alter audit results in any way, or if they mistreat our team members or representatives'. [2021 Corporate Responsibility Report, N/A: corporate.target.com] Score 2 • Met: Working with suppliers to meet HR requirements: It indicates: 'We train our vendors on a variety of Target policies and commitments, including our health and safety requirements, environmental standards and our expectations around hiring practices to help prevent the possibility of forced labor. When we update our policies and commitments, we notify our

Indicator Code	Indicator name	Score (out of 2)	Explanation
			improve their supply chains'. Also, 'In 2017, we rolled out a Responsible Sourcing Advisory Program that aims to bring innovative labor management practices and a continuous improvement culture to our strategic vendors and factories. The program provides train-the-trainer support in key focus areas: management systems, building worker-management social performance teams, supervisory skills, workplace communication, negotiation skills and grievance mechanisms'. [Responsible Sourcing Operations (web), N/A: corporate.target.com]
B.1.8	Approach to engagement with affected stakeholders	0	The individual elements of the assessment are met or not as follows: Score 1 Not Met: Stakeholder process or systems to identify and engage with workers/communities in the last two years: The Company discloses its stakeholders which include civil society organizations, guests, team members, vendors. For each group of stakeholders, it discloses the engagement process, topics raised and the Company's responses. However, it is not clear how it has identified and engaged with workers and/or local communities in its supply chain, in the last two years. The Company has provided additional comment/source to CHRB regarding this indicator. However, evidence provided had already been used. [ESG Priorities and Stakeholder Engagement (web), N/A: corporate.target.com Not Met: Discloses stakeholders that HRs may be affected: Although human rights were among the topics raised with the different group of stakeholders, it is not clear the categories of stakeholders whose human rights have been or may be affected by its activities. [ESG Priorities and Stakeholder Engagement (web), N/A: corporate.target.com Not Met: Provides two examples of engagement with stakeholders Score 2 Not Met: Analysis of stakeholder views on company's HR issues Not Met: Describe how views influenced company's HR approach

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.1	Identifying human rights risks and impacts	1	The individual elements of the assessment are met or not as follows: Score 1 • Met: Identifying risks in own operations: The CSR report indicates that 'In early 2019, we partnered with Article One, an expert business and human rights consultancy, to complete a human rights impact assessment (HRIA) that helped identify salient human rights issues in our operations and business relationships and guided the specific issues addressed in our Human Rights Statement. The HRIA covered our own operations, as well as our supply chain, and considered human rights risks to our team members, guests, workers in our supply chain and the communities we operate in. As part of this assessment, Article One conducted desk research and interviews with key internal and external stakeholders to identify our most salient human rights risks. Applying the UN Guiding Principles saliency methodology, Article One considered the likelihood and severity of a potential impact'. [2021 Corporate Responsibility Report, N/A: corporate.target.com] • Met: Identifying risks through relevant business relationships: As its stated above, it the HRIAs coves its supply chain. [2021 Corporate Responsibility Report, N/A: corporate.target.com] Score 2 • Not Met: Describe ongoing global risk identification in consultation with stakeholder/HR experts: It indicates, in its 2021 CSR Report, that: 'In early 2019, we partnered with Article One, an expert business and human rights consultancy, to complete a human rights impact assessment (HRIA) that helped identify salient human rights issues in our operations and business relationships []. As part of this assessment, Article One conducted desk research and interviews with key internal and external stakeholders to identify our most salient human rights risks. [] We plan on updating the companywide HRIA in 2022'. However, it is not clear this process involves consultation with affected stakeholders. [2021 Corporate Responsibility Report, N/A: corporate.target.com] • Not Met: Describes risks identified
B.2.2	Assessing human rights risks and impacts	0	The individual elements of the assessment are met or not as follows: Score 1 Not Met: Describe process for assessment of HR risks and discloses salient HR issues: It indicates, in its 2021 CSR Report, that: 'In early 2019, we partnered with Article One, an expert business and human rights consultancy, to complete a human rights impact assessment (HRIA). () The HRIA covered our own operations, as well as our supply chain, and considered human rights risks to our team members, guests, workers in our supply chain and the communities we operate in.

Indicator Code	Indicator name	Score (out of 2)	Explanation
			() Applying the UN Guiding Principles saliency methodology, Article One considered the likelihood and severity of a potential impact'. However, no further details of the process for assessing its human rights risks found. Description should include how relevant factors are taken into account, such as geographical, economic, social and other factors. [2021 Corporate Responsibility Report, N/A: corporate.target.com] & [Human Rights Statement (web), N/A: corporate.target.com] • Not Met: How process applies to supply chain: See above. Although the process covers its supply chain, no further details of its process for assessing its human rights risks found. Description should include how relevant factors are taken into account, such as geographical, economic, social and other factors. [2021 Corporate Responsibility Report, N/A: corporate.target.com] • Not Met: Public disclosure of the results of HR assessment: Although the Company indicates its has completed a Human Rights Impact Assessment (HRIA), no further details found of the results of its assessments. [2021 Corporate Responsibility Report, N/A: corporate.target.com] Score 2 • Not Met: Meets all requirements under score 1
B.2.3	Integrating and acting on human rights risks and impact assessments	0	 Not Met: How it involved affected stakeholders in the assessment The individual elements of the assessment are met or not as follows: Score 1 Not Met: Action Plans to mitigate risks Not Met: Description of how global system applies to supply chain Not Met: Example of actions decided on at least 1 salient HR issues: The CA Transparency in Supply Chains Act indicates: 'Target also provides in-person, infacility and classroom training options for a variety of compliance topics, including forced labor and human trafficking. For example, Target collaborated with Verité to conduct trainings in select markets specifically on the topics of responsible recruitment and ethical management of foreign contract workers. Our training materials emphasize strong social compliance management practices and focus on preventing and managing related issues, including human trafficking and forced labor'. It is not clear, however, who receives these trainings, and whether it is part of a Company's response to a salient risk/impact. [2021 Corporate Responsibility Report, N/A: corporate.target.com] Score 2 Not Met: Meets all requirements under score 1 Not Met: Involve stakeholders in decisions about actions
B.2.4	Tracking 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 for tracking or monitor if actions taken are effective Not Met: Lessons learnt from checking system effectiveness Score 2 Not Met: Meets both requirements under score 1 Not Met: Involve stakeholders in evaluation of actions taken
B.2.5	Communicating on human rights impacts	0	The individual elements of the assessment are met or not as follows: Score 1 Not Met: Provides two examples of comms with stakeholders Score 2 Not Met: Describe challenges to effective comms and how it is working to address them

C. Remedies and Grievance Mechanisms (20% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.1	Grievance channel(s)/mec hanism(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: The Code of Ethics indicates that all workers can 'Voice a concern, ask a question or report a violation' via email, an Integrity Hotline, a phone line or through a regular mail. [Code of Ethics, 06/2021: corporate.target.com] Score 2 • Not Met: Channel is available in all appropriate languages and workers aware: Regarding the Integrity Hotline, the Company indicates: 'The call is free and handled by an independent third party. Local language interpreters are also available'. However, it is not clear how workers are made aware of the Company's grievance mechanisms. The Company has provided additional comments to CHRB regarding this indicator. However, evidence was not material. [Applying Target Standards of Vendor Engagement, 2020: corporate.target.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			Met: Describe how workers in the supply chain have access to grievance mechanism: It indicates: 'We also expect suppliers to maintain effective grievance mechanisms for workers, aligned with the criteria outlined in the UN Guiding Principles on Business and Human Rights. Ethics reporting posters were released in 2021 to distribute to all factory and supplier locations to ensure that all workers have access to the hotline reporting option—including information on how to access and engage with Target's Integrity Hotline'. [2021 Corporate Responsibility Report, N/A: corporate.target.com] Not Met: Expect Suppliers to convey expectation to their own suppliers: Although the Company expects its suppliers to maintain a grievance mechanism and have access to the Company's own hotline, it is not clear it expects its suppliers to convey the same expectation on access to grievance mechanisms to their own suppliers. [2021 Corporate Responsibility Report, N/A: corporate.target.com]
C.2	Grievance channel(s)/mec hanism(s) to receive complaints or concerns from external individuals and communities	1	The individual elements of the assessment are met or not as follows: Score 1 • Met: Grievance mechanism for community: The Report Disclaimer webpage is openly available to all external individuals and communities who may be adversely impacted by the company, or those acting on their behalf, to raise complaints or concerns. [EthicsPoint-Target, N/A: secure.ethicspoint.com] Score 2 • Not Met: Describes accessibility and local languages and stakeholder awareness: Although the Report Disclaimer webpage is openly available to anyone, it only seems to be available in two languages. Also, it is not clear that the other grievance mechanisms are also available for individuals and communities in local languages. Moreover, it is not clear how affected external stakeholders at its own operations are aware of these services. [EthicsPoint-Target, N/A: secure.ethicspoint.com] • Not Met: Communities access mechanism direct or through suppliers • Not Met: Expect supplier to convey expectation to their own suppliers
C.3	Users are involved in the design and performance of the channel(s)/mec hanism(s)	0	The individual elements of the assessment are met or not as follows: Score 1 Not Met: Engages users to create or assess system Not Met: Examples (at least two) of how they do this Score 2 Not Met: Engages with potential or actual users on the improvement of the mechanism Not Met: Provides user engagement example (at least two) on improvement
C.4	Procedures related to the mechanism(s)/c hannel(s) are equitable, publicly available and explained	0	The individual elements of the assessment are met or not as follows: Score 1 Not Met: Response timescales and how complainants will be informed Not Met: Describe support (technical, financial,etc) available for equal access by complainants Score 2 Not Met: Describe types of outcome to complainant through use of mechanism Not Met: Escalation to senior/independent level
C.5	Prohibition of retaliation for raising complaints or concerns	1	The individual elements of the assessment are met or not as follows: Score 1 • Met: Public statement prohibiting retaliation: The Company states in its website section 'Standards of Vendor engagement': 'Retaliation of any kind against an individual who reports concerns in good faith violates Target's principles and will not be tolerated.' [Standards of Vendor Engagement on web, N/A: corporate.target.com] • Met: Practical measures to prevent retaliation: In addition, in its Hotline - FAQ document, it indicates: 'When you call the hotline or report online you have the option to remain anonymous in any country where it is not prohibited by law. When reporting directly to a leader or HR at your location, or emailing Integrity@Target.com, we'll make every effort to maintain your anonymity whenever possible'. It also indicates that 'if you feel that you've been retaliated against for making a report or participating in an investigation, you can talk to a leader or HR at your location, submit a report online, or call the Integrity Hotline (although this is said in the context of 'team members', the commitment to non-retaliation, as indicated above, is against 'an individual who reports concerns in good faith'. [Hotline - FAQ, N/A: secure.ethicspoint.com] Score 2 • Not Met: Company indicate it will not retaliate against workers/stakeholders

Indicator Code	Indicator name	Score (out of 2)	Explanation
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 Not Met: Complainants not asked to waive rights Not Met: Company does not require confidentiality provisions Score 2 Not Met: Will work with state based non judicial mechanisms Not Met: Example of issue resolved (if applicable)
C.7	Remedying adverse impacts	1	The individual elements of the assessment are met or not as follows: Score 1 • Met: Describes how remedy has been provided: 'It indicates: 'in early 2018, the NGO Transparentem shared with Target that they had identified indicators of forced labor at a facility used by one of our vendors in Malaysia. Although we were no longer doing business with the facility for unrelated reasons, we took swift action. Those actions entailed working with the facility's other customers and a credible third-party expert in forced labor to validate the claims and then partnering with our vendor, the facility and its other customers to develop and implement a corrective action plan to address the issues. That work included, among other things, returning passports to the foreign contract workers employed there, requiring reimbursement to workers for the recruitment fees they paid to secure their jobs in violation of the Employer Pays Principle, and overhauling the facility's management and hiring practices to ensure the issues would not recur'. [2020_CA Transparency in Supply Chains Act, 2020: help.target.com] Score 2 • Not Met: Changes to systems, processes and practices to stop similar impact • Not Met: Describe approach to monitoring implementation of agreed remedy • Not Met: Approach to learning from incident to prevent future impacts
C.8	Communication on the effectiveness of grievance mechanism(s) and incorporating lessons learned	0	The individual elements of the assessment are met or not as follows: Score 1 Not Met: Number grievances filed, addressed or resolved and outcome achieved Not Met: How lessons from mechanism improve management system Score 2 Not Met: Evaluation of the channel/mechanism and changes made as result Not Met: Describes procedures to address delays of outcomes agreed with stakeholders

D. Performance: Company Human Rights Practices (25% 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 Not Met: Discloses timebound target for suppliers to pay living wage or include in code or contracts: The Business Partner Code of Conduct indicates: '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, it is not clear it has a timebound target for requiring its suppliers to pay all workers a living wage or that the company includes requirements to pay workers a living wage in its contractual arrangements with its suppliers or its supplier code of conduct. A living wage should cover basic needs and provide some discretionary for employees and his/her family and or depends. [Business Partner Code of Conduct, N/A: corporate.target.com] Not Met: Improving living wage practices of suppliers Score 2 Not Met: Assessment of number affected by payment below living wage Not Met: Provides analysis of trends demonstrating progress

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.1.2	Aligning purchasing decisions with human rights	0	The individual elements of the assessment are met or not as follows: Score 1 Not Met: Avoids business model pressure on HRs (purchasing practices): It indicates: 'Target is committed to a sustainable and inclusive supply chain that is just and equitable for all workers. () By 2025, we plan for 100% of owned-brand suppliers to regard Target's purchasing practices as industry-leading. We intend all strategic business partners to rate Target's purchasing practices at 4 stars or above on the Better Buying Supplier Survey'. However, it is not clear the practices it adopts to avoid price or short notice requirements or other business considerations undermining human rights. [2021 Corporate Responsibility Report, N/A: corporate.target.com] Not Met: Practices adopted to pay suppliers in line with agreed timeframes Not Met: Review own operations to mitigate negative impact Score 2 Not Met: Meets all requirements under score 1 Not Met: Examples of how it assessed, addressed and change purchasing practices
D.1.3	Mapping and disclosing the supply chain	0	The individual elements of the assessment are met or not as follows: Score 1 Not Met: Identifies direct and indirect suppliers back to manufacturing sites (factories or fields): The Company indicates: 'Target is committed to increased supply chain transparency. To meet this objective, we publish a list of all tier 1 factories that produce our owned brand products, national brand products where Target is the importer of record, as well as tier 2 apparel textile mills and wet processing facilities'. However, although it affirms that it identifies tier 2 apparel suppliers, it is not clear it does the same for its food supply chain. [Responsible Sourcing Operations (web), N/A: corporate.target.com] Score 2 Not Met: Discloses names and locations of 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 owned brand products, national brand products where Target is the importer of record, as well as tier 2 apparel textile mills and wet processing facilities. The list includes factory name and specific location. However, no evidence found that it also discloses the most significant parts of its indirect food supply chain. In this case, the Company would also be expected to explain. how it has defined what the most significant parts of its supply chain are. [Responsible Sourcing Operations (web), N/A: corporate.target.com] & [Global Factory List, 07/01/2022: corporate.target.com] Not Met: Discloses which direct or indirect suppliers is involved in higher-risk activities
D.1.4.b	Prohibition of child labour: Age verification and corrective actions (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 • Not Met: Child Labour rules in codes or contracts: The Business Partner Code of Conduct indicates: '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 Supply Chain Labor & Human Rights, the Company indicates: 'During the responsible sourcing audit, personnel records are reviewed and the hiring process is discussed with management. Through this process, verification of established formal procedures ensuring review of age documentation () is undertaken'. However, it is not clear all suppliers are subject to these audits. Moreover, 'If we find underage labor at any factory, we immediately review all aspects of the situation, and where possible, we work with a credible third-party expert to develop and implement a comprehensive remediation plan in line with internationally defined best practices'. However, no explicit requirement of remediation programmes found among its contractual arrangements with its suppliers or supplier code of conduct. [Business Partner Code of Conduct, N/A: corporate.target.com] & [Supply Chain Labor & Human Rights on web, N/A: corporate.target.com] • Not Met: How working with suppliers on child labour in supply chain • Not Met: Assessement of number affected by child labour in supply chain • Not Met: Analysis of trends in progress made

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.1.5.b	Prohibition of forced labour: Recruitment fees and costs (in the supply chain)	1	The individual elements of the assessment are met or not as follows: Score 1 • Met: Debt and fees rules in codes or contracts: The Business Partner Code of Conduct indicates: 'We condemn forced labor and human trafficking and will not knowingly work with suppliers who engage in these practices or the use of incarcerated labor. All workers have the right to engage in work willingly, without surrendering identification and without the payment of fees'. Also, the webpage Supply Chain Labor & Human Rights Policies indicates: 'We do not condone () allowing labor agents or brokers to charge fees or engaging in deceptive recruitment practices'. [Business Partner Code of Conduct, N/A: corporate.target.com] & [Supply Chain Labor & Human Rights on web, N/A: corporate.target.com] • Met: How working with suppliers on debt & fees: Regarding its supply chain, it indicates in its 2021 CSR Report: 'Target is a proud member of the Leadership Group for Responsible Recruitment—an initiative of the Institute for Human Rights and Business—where we utilize our collective influence, voice and size to push for improved recruitment systems globally. We are committed to the Employer Pays Principle and have helped to return significant sums to workers around the world through reimbursement of recruitment expenses. We are also working toward ensuring that workers pay no fees to secure jobs from the start'. Moreover, the 2020 CA Transparency in Supply Chains Act stated: 'Target also provides in-person, in-facility and classroom training options for a variety of compliance topics, including forced labor and human trafficking. Target collaborated with Verité to conduct trainings in select markets specifically on the topics of responsible recruitment and ethical management of foreign contract workers. Our training materials emphasize strong social compliance management practices and forced labor'. [2021 Corporate Responsibility Report, N/A: corporate.target.com] & [2020_CA Transparency in Supply Chains Act, 2020: help.target.com] • Not M
D.1.5.d	Prohibition of forced labour: Wage practices (in the supply chain)	0.5	The individual elements of the assessment are met or not as follows: Score 1 • Met: Suppliers to pay workers in full and on time in codes or contracts: The Business Partner Code of Conduct indicates: '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'. Also: 'Workers have the right to terminate their employment without penalty upon providing reasonable notice'. The Standards of Vendor Engagement (SOVE) indicates: 'We require all vendors, suppliers, third-party sellers, manufacturers, contractors, subcontractors and their agents (collectively, "suppliers") to abide by the following standards'. It has the same wages provisions as the Business Partner Code of Conduct. The document Applying Standards of Vendor Engagement, which is a guide to SOVE, indicates: 'Ensure deductions are used specifically for the purpose stated and maintain supporting documentation to prove mandatory deductions are taken and applied in accordance with local law. Do not deduct amounts for dormitory, meal, or similar expenses, which exceed actual cost. Keep records available, which demonstrate the actual cost of these expenses, if they are deducted from worker wages. Do not take deductions from wages unless they are mandatory under local law or voluntary, reasonable, and clearly understood by workers. Deductions are not be taken from wages for damaged goods, tardiness, or failure to meet production quotas. Do not use short-term or renewable contracts that are not substantively different from full-time employment opportunities, in order to avoid payment of benefits, higher wages or promotions to workers under local law. Properly recognize the length of service of all workers in order to determine benefits to which they are entitled, as applicable'. [Business Partner Code of Conduct, N/A: corporate.target.com

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.1.5.f	Prohibition of forced labour: Restrictions on workers (in the supply chain)	1	The individual elements of the assessment are met or not as follows: Score 1 • Met: Free movement rules in codes or contracts: The Business Partner Code of Conduct indicates: 'Workers have the right to freedom of movement and our suppliers must ensure it is afforded to them'. In addition, in its website section Supply Chain Labor & Human Rights, the Company states: 'We do not condone holding workers' passports or other personal documents (). We review these policies in detail during our audit process and expect our vendors to share these views and comply'. [Business Partner Code of Conduct, N/A: corporate.target.com] & [Supply Chain Labor & Human Rights on web, N/A: corporate.target.com] • Met: How working with suppliers on free movement: The CA Transparency in Supply Chains Act indicates: 'Target also provides in-person, in-facility and classroom training options for a variety of compliance topics, including forced labor and human trafficking. For example, Target collaborated with Verité to conduct trainings in select markets specifically on the topics of responsible recruitment and ethical management of foreign contract workers. Our training materials emphasize strong social compliance management practices and focus on preventing and managing related issues, including human trafficking and forced labor'. [2020_CA Transparency in Supply Chains Act, 2020: help.target.com] Score 2 • Not Met: Assessment of the number affected by retaining docs or restricting movement
D.1.6.b	Freedom of association and collective bargaining (in the supply chain)	0	Not Met: Provides analysis of trends demonstrating progress The individual elements of the assessment are met or not as follows: Score 1 Not Met: FoA & CB rules in codes or contracts: Regarding its requirements to respect freedom of association, the Company indicates in the Business Partner Code of Conduct: '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, no evidence found in relation to the right to collective bargaining and commitment to not interfere with the exercise of these rights. [Business Partner Code of Conduct, N/A: corporate.target.com] Not Met: How working with suppliers on FoA and CB Score 2 Not Met: Assessment of the number affected by restrictions to FoA and CB in the SP Not Met: Provides analysis of trends demonstrating progress
D.1.7.b	Health and safety: Fatalities, lost days, injury, occupational disease rates (in the supply chain)	0.5	The individual elements of the assessment are met or not as follows: Score 1 • Met: Sets out clear Health and Safety requirements: In its Business Partner Code of Conduct, 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, the Company indicates on its website that H&S 'violations have been a major focus of Target's responsible sourcing audit process. We conduct an in-depth review of a facility's health and safety practices across all buildings, reviewing 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'. [Business Partner Code of Conduct, N/A: corporate.target.com] & [Supply Chain Labor & Human Rights on web, N/A: corporate.target.com] • Not Met: Injury Rate or Lost days or Near miss disclosures for last reporting period: Concerning health and safety in the supply chain, the Company only discloses the 'average number of health and safety issues per audit'. No further detail has been disclosed in published documents regarding quantitative data. [2021 Corporate Responsibility Report, N/A: corporate.target.com] • Not Met: Fatalities rate for lasting reporting period: Concerning health and safety in the supply chain, the Company only discloses the 'average number of health and safety issues per audit'. No further detail has been disclosed in published documents regarding quantitative data. [2021 Corporate.target.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			• Not Met: Occupation disease rate for last reporting period: Concerning health and safety in the supply chain, the Company only discloses the 'average number of health and safety issues per audit'. No further detail has been disclosed in published documents regarding quantitative data. [2021 Corporate Responsibility Report, N/A: corporate.target.com] Score 2
			• Met: How working with suppliers on H&S: In its CSR Report 2019, 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 2019, 2019] • Not Met: Assessment of the number affected by H&S issues in the SP • Not Met: Provides analysis of trends demonstrating progress
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 Not Met: Rules on land & owners in codes or contracts Not Met: How working with suppliers on land issues Score 2 Not Met: Includes resettlement requirements that the supplier provides financial compensation Not Met: Assessment of the number affected by land rights issues in its SP
D.1.9.b	Water and sanitation (in the supply chain)	0.5	• Not Met: Provides analysis of trends demonstrating progress The individual elements of the assessment are met or not as follows: Score 1 • Not Met: Rules on water stewardship in codes or contracts: The Company requires in its Business Partner Code of Conduct: 'Suppliers must identify, characterize and inventory all wastewater streams on an ongoing basis. In addition, suppliers must install and maintain appropriately sized wastewater treatment systems to ensure pollutants are at or below legally required levels. We will not tolerate suppliers with undersized, bypassed, or inoperable wastewater treatment systems. [] Suppliers must handle, store, transport, and dispose of hazardous waste legally. We will not tolerate suppliers that engage in illegal waste dumping. We seek suppliers who demonstrate they actively work to reduce waste throughout the production process'. However, no reference found to refraining from negatively affecting access to safe water beyond waste-related issues (i.e sufficient water availability). [Business Partner Code of Conduct, N/A: corporate.target.com] • Met: How working with suppliers on water stewardship issues: In its CSR Report 2019, 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 are working to improve water efficiency in our raw material and manufacturing supply chains, in our own operations and in the communities where we operate. We collaborate with third parties to better understand our impacts and amplify our efforts, including the WWF, Ceres' Connect the Drops campaign, the AgWater Challenge, BCI, ZDHC, Conserve Irrigation and Water.org'. The 2021 CSR Report indicates the it partners with BCI Farmers and the program consists in 'Helping train farmers to use water efficiently and reduce their use of the most harmful chemicals, as well as committing to respecting worker rights and well-being'. [2021 Corporate Responsibility Report, N/A: corporate.targe

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.1.10.b	Indicator name Women's rights (in the supply chain)	Score (out of 2) 0.5	The individual elements of the assessment are met or not as follows: Score 1 Not Met: Women's rights in codes or contracts: The Business Partner Code of Conduct indicates: '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 upon on their abilities, rather than their () sex, pregnancy status, gender identity, marital status () or any other characteristics unrelated to an individual's ability to perform the work required by the job'. However, it is not clear the Company requires suppliers, in its contractual arrangements with suppliers or supplier code of conduct, to provide equal pay for equal work, introduce measures to ensure equal opportunities throughout all levels of employment and to eliminate health and safety concerns that are particularly prevalent among women workers. [Business Partner Code of Conduct, N/A: corporate.target.com] Met: How working with suppliers on women's rights: In its CSR Report 2019, the Company indicates: 'Target's three-year, \$4.5 million commitment to CARE's Dignified Work Initiative supports women's empowerment and well-being in Bangladesh, Indonesia and Vietnam. A foundational component of this work was the creation of Empowerment, Knowledge and Transformative Action (EKATA) groups. Comprised of female factory workers, the groups provide training, facilitate access to social services and act as an information resource for other workers. Through the EKATA trainings, workers also are able to identify barriers to their rights and well-being and then act to address them through awareness campaigns and worker-management forums. HERproject: We have partnered with BSR's HERproject, an initiative to empower women working in global supply chains via workplace-based interventions on health, financial inclusion, and gender equality'. [Corporate Social Responsibility Report 2019, 2019] Score 2
			working conditions • 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	The individual elements of the assessment are met or not as follows: Score 1 Not Met: Discloses living wage requirements in supplier code or contracts: The Business Partner Code of Conduct indicates: '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, it is not clear it has a timebound target for requiring its suppliers to pay all workers a living wage or that the company includes requirements to pay workers a living wage in its contractual arrangements with its suppliers or its supplier code of conduct. A living wage should cover basic needs and provide some discretionary for employees and his/her family and or depends. [Business Partner Code of Conduct, N/A: corporate.target.com] Not Met: Improving living wage practices of suppliers Score 2 Not Met: Assessment of number affected by payment below living wage Not Met: Provides analysis of trends demonstrating progress
D.2.2	Aligning purchasing decisions with human rights	0	The individual elements of the assessment are met or not as follows: Score 1 Not Met: Avoids business model pressure on HRs (purchasing practices): The Company indicates that 'Target is committed to a sustainable and inclusive supply chain that is just and equitable for all workers. () By 2025, we plan for 100% of owned-brand suppliers to regard Target's purchasing practices as industry-leading. We intend all strategic business partners to rate Target's purchasing practices at 4 stars or above on the Better Buying Supplier Survey'. However, it is not clear the practices it adopts to avoid price or short notice requirements or other business considerations undermining human rights. Not Met: Practices adopted to pay suppliers in line with agreed timeframes Not Met: Review own operations to mitigate negative impact Score 2 Not Met: Meets all requirements under score 1 Not Met: Examples of how it assessed, addressed and change purchasing practices

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.2.3	Mapping and		The individual elements of the assessment are met or not as follows:
	disclosing the		Score 1
	supply chain		Met: Identifies direct and indirect suppliers back to manufacturing sites (factories)
			or fields): The Company indicates: 'Target is committed to increased supply chain
			transparency. To meet this objective, we publish a list of all tier 1 factories that
			produce our owned brand products, national brand products where Target is the importer of record, as well as tier 2 apparel textile mills and wet processing
			facilities'. [Responsible Sourcing Operations (web), N/A: corporate.target.com]
			Score 2
		1.5	Met: Discloses names and locations of 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 owned brand
			products, national brand products where Target is the importer of record, as well
			as tier 2 apparel textile mills and wet processing facilities. The list includes factory
			name and specific location. [Responsible Sourcing Operations (web), N/A: corporate.target.com] & [Global Factory List, 07/01/2022: corporate.target.com]
			Not Met: Discloses which direct or indirect suppliers is involved in higher-risk
			activities
D.2.4.b	Prohibition of		The individual elements of the assessment are met or not as follows:
	child labour:		Score 1
	Age verification		• Not Met: Child Labour rules in codes or contracts: The Business Partner Code of
	and corrective		Conduct indicates: 'We do not tolerate the use of underage labor and will not
	actions (in the		knowingly work with suppliers that utilize underage workers. [] Suppliers must
	supply chain)		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 Supply Chain
			Labor & Human Rights, the Company indicates: 'During the responsible sourcing
			audit, personnel records are reviewed and the hiring process is discussed with
			management. Through this process, verification of established formal procedures
			ensuring review of age documentation () is undertaken´. However, it is not clear
			all suppliers are subject to these audits. Moreover, 'If we find underage labor at
		0	any factory, we immediately review all aspects of the situation, and where possible,
		0	we work with a credible third-party expert to develop and implement a comprehensive remediation plan in line with internationally defined best
			practices'. However, no explicit requirement of remediation programmes found
			among its contractual arrangements with its suppliers or supplier code of conduct.
			[Business Partner Code of Conduct, N/A: corporate.target.com] & [Supply Chain
			Labor & Human Rights on web, N/A: <u>corporate.target.com</u>]
			Not Met: How working with suppliers on child labour: The 2021 CSR Report
			states: 'Target works with GoodWeave to combat underage labor in the
			handwoven goods industry in India. GoodWeave-certified rugs are woven by adult
			artisans and help support the education of thousands of at-risk children that might otherwise need to work'. No further details found. [2021 Corporate Responsibility
			Report, N/A: corporate.target.com
			Score 2
			Not Met: Assessement of number affected by child labour in supply chain
			Not Met: Analysis of trends in progress made
D.2.5.b	Prohibition of		The individual elements of the assessment are met or not as follows:
	forced labour:		Score 1
	Recruitment		Met: Debt and fees rules in codes or contracts: The Business Partner Code of Conduct indicates: 'We condemn forced labor and human trafficking and will not
	fees and costs		knowingly work with suppliers who engage in these practices or the use of
	(in the supply		incarcerated labor. All workers have the right to engage in work willingly, without
	chain)	1	surrendering identification and without the payment of fees'. Also, the webpage
			Supply Chain Labor & Human Rights Policies indicates: 'We do not condone ()
			allowing labor agents or brokers to charge fees or engaging in deceptive
			recruitment practices'. [Business Partner Code of Conduct, N/A:
			corporate.target.com] & [Supply Chain Labor & Human Rights on web, N/A:
]		<u>corporate.target.com</u>]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			Met: How working with suppliers on debt & fees: Regarding its supply chain, it indicates in its 2021 CSR Report: 'Target is a proud member of the Leadership Group for Responsible Recruitment—an initiative of the Institute for Human Rights and Business—where we utilize our collective influence, voice and size to push for improved recruitment systems globally. We are committed to the Employer Pays Principle and have helped to return significant sums to workers around the world through reimbursement of recruitment expenses. We are also working toward ensuring that workers pay no fees to secure jobs from the start'. Moreover, the 2020 CA Transparency in Supply Chains Act stated: 'Target also provides in-person, in-facility and classroom training options for a variety of compliance topics, including forced labor and human trafficking. Target collaborated with Verité to conduct trainings in select markets specifically on the topics of responsible recruitment and ethical management of foreign contract workers. Our training materials emphasize strong social compliance management practices and focus on preventing and managing related issues, including human trafficking and forced labor'. [2021 Corporate Responsibility Report, N/A: corporate.target.com] & [2020_CA Transparency in Supply Chains Act, 2020: help.target.com] Score 2 Not Met: Assessment of the number affected by payment of recruitment fees Not Met: Analysis of trends in progress made
D.2.5.d	Prohibition of forced labour: Wage practices (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 Not Met: Requirement for suppliers to pay workers in full and on time in codes or contracts Not Met: How working with supply chain to pay workers regularly and on time Score 2 Not Met: Assessment of the number affected by failure to pay directly Not Met: Provides analysis of trends demonstrating progress
D.2.5.f	Prohibition of forced labour: Restrictions on workers (in the supply chain)	1	The individual elements of the assessment are met or not as follows: Score 1 • Met: Free movement rules in codes or contracts: The Business Partner Code of Conduct indicates: 'Workers have the right to freedom of movement and our suppliers must ensure it is afforded to them'. In addition, in its website section Supply Chain Labor & Human Rights, the Company states: 'We do not condone holding workers' passports or other personal documents (). We review these policies in detail during our audit process and expect our vendors to share these views and comply'. [Business Partner Code of Conduct, N/A: corporate.target.com] & [Supply Chain Labor & Human Rights on web, N/A: corporate.target.com] • Met: How working with suppliers on free movement: The CA Transparency in Supply Chains Act indicates: 'Target also provides in-person, in-facility and classroom training options for a variety of compliance topics, including forced labor and human trafficking. For example, Target collaborated with Verité to conduct trainings in select markets specifically on the topics of responsible recruitment and ethical management of foreign contract workers. Our training materials emphasize strong social compliance management practices and focus on preventing and managing related issues, including human trafficking and forced labor'. [2020_CA Transparency in Supply Chains Act, 2020: help.target.com] Score 2 • Not Met: Assessment of the number affected by retaining docs or restricting movement • Not Met: Provides analysis of trends demonstrating progress
D.2.6.b	Freedom of association and collective bargaining (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 Not Met: FoA & CB rules in codes or contracts: Regarding its requirements to respect freedom of association, the Company indicates in the Business Partner Code of Conduct: '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, no evidence found in relation to the right to collective bargaining and commitment to not interfere with the exercise of these rights. [Business Partner Code of Conduct, N/A: corporate.target.com] Not Met: How working with suppliers on FoA and CB Score 2 Not Met: Assessment of the number affected by restrictions to FoA and CB in the SP Not Met: Provides analysis of trends demonstrating progress

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.2.7.b	Health and		The individual elements of the assessment are met or not as follows:
J.20	safety:		Score 1
	Fatalities, lost		• Met: Sets out clear Health and Safety requirements: In its Business Partner Code
	days, injury,		of Conduct, the Company indicates: 'Suppliers must provide a safe and healthy
	occupational		working environment that complies with local laws and minimizes occupational
	T		hazards. If suppliers provide residential facilities for their workers, they must be
	disease rates		safe and sanitary'. In addition, the Company indicates on its website that H&S
	(in the supply		'violations have been a major focus of Target's responsible sourcing audit process.
	chain)		We conduct an in-depth review of a facility's health and safety practices across all
			buildings, reviewing 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'. [Business Partner Code of
			Conduct, N/A: corporate.target.com & [Supply Chain Labor & Human Rights on
			web, N/A: corporate.target.com
			Not Met: Injury Rate or Lost days or Near miss disclosures for last reporting
			period: Concerning health and safety in the supply chain, the Company only
			discloses the 'average number of health and safety issues per audit'. No further
			detail has been disclosed in published documents regarding quantitative data. [2021 Corporate Responsibility Report, N/A: corporate.target.com]
		0.5	Not Met: Fatalities for last reporting period: Concerning health and safety in the
			supply chain, the Company only discloses the 'average number of health and safety
			issues per audit'. No further detail has been disclosed in published documents
			regarding quantitative data. [2021 Corporate Responsibility Report, N/A:
			corporate.target.com]
			Not Met: Occupation disease rate for last reporting period: Concerning health
			and safety in the supply chain, the Company only discloses the 'average number of
			health and safety issues per audit'. No further detail has been disclosed in
			published documents regarding quantitative data. [2021 Corporate Responsibility
			Report, N/A: <u>corporate.target.com</u>]
			Score 2
			• Met: How working with suppliers on H&S: It indicates, in its 2021 CSR Report:
			Target continues to enhance the safety of workers in the supply chains through
			engagement with both our Nirapon initiative and the Life and Building Safety
			(LABS) Initiative. A collaboration between global apparel and footwear brands and
			retailers, LABS is tasked with creating and implementing a shared standard to
			prevent structural, electrical and fire safety issues in India and Vietnam. In 2020,
			Target continued its roll out of LABS in Vietnam'. [2021 Corporate Responsibility
			Report, N/A: corporate.target.com • Not Met: Assessment of the number affected by H&S issues in the SP
			Not Met: Assessment of the number affected by flag issues in the SP Not Met: Provides analysis of trends demonstrating progress
D.2.8.b	Women's rights		The individual elements of the assessment are met or not as follows:
5.2.0.5	(in the supply		Score 1
	chain)		Not Met: Women's rights in codes or contracts: The Business Partner Code of
	Citality		Conduct indicates: '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 upon
		0.5	on their abilities, rather than their () sex, pregnancy status, gender identity,
		0.5	marital status () or any other characteristics unrelated to an individual's ability to
			perform the work required by the job'. However, it is not clear the Company
			requires suppliers, in its contractual arrangements with suppliers or supplier code
			of conduct, to provide equal pay for equal work, introduce measures to ensure
			equal opportunities throughout all levels of employment and to eliminate health
			and safety concerns that are particularly prevalent among women workers.
			[Business Partner Code of Conduct, N/A: corporate.target.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			• Met: How working with suppliers on women's rights: In its CSR Report 2019, the
			Company indicates: 'Target's three year, \$4.5 million commitment to CARE's
			Dignified Work Initiative supports women's empowerment and well-being in
			Bangladesh, Indonesia and Vietnam. A foundational component of this work was
			the creation of Empowerment, Knowledge and Transformative Action (EKATA)
			groups. Comprised of female factory workers, the groups provide training, facilitate
			access to social services and act as an information resource for other workers.
			Through the EKATA trainings, workers also are able to identify barriers to their
			rights and well-being and then act to address them through awareness campaigns
			and worker-management forums. HERproject: We have partnered with BSR's
			HERproject, an initiative to empower women working in global supply chains via
			workplace-based interventions on health, financial inclusion, and gender equality.'
			[Corporate Social Responsibility Report 2019, 2019]
			Score 2
			Not Met: Assessment on the number affected by discrimination or unsafe
			working conditions
			Not Met: Provides analysis of trends demonstrating progress
D.2.9.b	Working hours		The individual elements of the assessment are met or not as follows:
	(in the supply		Score 1
	chain)		Met: Working hours in codes or contracts: The Business Partner Code of Conduct
			states 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
		٥٢	amount specified by local law, whichever is less. Only in exceptional cases may
		0.5	working hours exceed 60 per week. Overtime work must always be voluntary and
			paid at a premium rate. Workers must have at least 1 full non-working day in every 7-day period'.
			[Business Partner Code of Conduct, N/A: corporate.target.com]
			Not Met: How working with suppliers on working hours
			Score 2
			Not Met: Assessment of number affected by excessive working hours
			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		No allegations meeting the CHRB severity threshold were found, and so the score
	allegation No 1		of 14.00 out of 80 points scored in themes A-D has been applied to produce a
			score of 3.50 out of 20 points for theme E.

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 2020 Key Findings report and the 2019 technical annex for more details of the research process.

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As WBA, 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.

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