



#### Corporate Human Rights Benchmark 2023 Company Scorecard

The TJX Companies
Apparel (supply chain and own operations)
6.1 out of 100

Theme score	Out of	For theme
1.1	10	A. Governance and Policy Commitments
1.1	25	B. Embedding Respect and Human Rights Due Diligence
2.5	20	C. Remedies and Grievance Mechanisms
0.1	25	D. Performance: Company Human Rights Practices
1.2	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 Policy Commitments (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	The individual elements of the assessment are met or not as follows: Score 1 • Met: General HRs commitment: The Global Code of Conduct indicates: 'At TJX, we respect human rights and believe it is important to seek out suppliers and other third parties who do so as well'. [Global Code of Conduct, 2021: tjx.com] • Not Met: Universal Declaration of Human rights (UDHR) • Not Met: International Bill of Human Rights Score 2 • Not Met: Commitment to UNGPs • Not Met: Commitment to OECD MNE Guidelines
A.1.2.a	Commitment to respect the human rights of workers: ILO Declaration on Fundamental Principles and Rights at Work	0	The individual elements of the assessment are met or not as follows: Score 1 • Not Met: Commitment to ILO core principles: The 2022 Corporate Responsibility Report indicates: 'Our philosophy towards social compliance mirrors our culture, and just as we are committed to honesty, integrity, and treating others with dignity and respect, we expect those that we do business with to do the same. We have reviewed and incorporated many of the international human rights standards enunciated by international bodies, such as the United Nations and the International Labour Organization. Our commitment to these principles is reflected in our Vendor Code of Conduct, which serves as the foundation for our program and our responsible sourcing initiatives'. However, no formal commitment to respecting the human rights that the ILO has declared to be fundamental rights at work found. Commitments are expected to be placed in Company policy documents under CHRB revised approach and therefore CSR reports are no longer

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul> <li>considered a valid source for this indicator. [2022 Corporate Responsibility Report, 2022: tix.com]</li> <li>Not Met: Explicitly lists all four ILO core principles: The Global Code of Conduct indicates: 'TJX does not permit unlawful discrimination of any kind'. However, no explicit commitments to respect freedom of association and the right to collective bargaining and the rights not to be subject to forced labour, child labour found. [Global Code of Conduct, 2021: tix.com]</li> <li>Score 2</li> <li>Not Met: Expects suppliers to commit to ILO core principles: The Vendor Code of Conduct indicates: 'Our Vendor Code of Conduct reflects those high standards, which embrace internationally recognized principles designed to protect the interests of the workers who manufacture products for sale in our businesses. These principles have been informed by, and in many instances incorporate, human rights, labor rights, and anti-corruption standards enunciated by the United Nations and other respected international bodies, such as the International Labour</li> </ul>
			Organization and its core standards'. However, it is not clear the Company expects suppliers to commit to respecting the human rights that the ILO has declared to be fundamental rights at work. [Vendor Code of Conduct_web, 06_2022: tjx.com] • Not Met: Explicitly lists all four ILO core principles for suppliers: The Company's Vendor Code of Conduct covers each ILO Core commitment: discrimination, forced labour, child labour, freedom of association and collective bargaining. As for freedom of association and collective bargaining. If expands: 'Our vendors must respect the rights of their workers to choose (or choose not) to freely associate and to bargain collectively where such rights are recognized by law. We prohibit harassment, retaliation, and violence against trade union members and representatives'. However, it is not clear whether the Company requires to respect those rights in all contexts, as it indicates 'where such rights are recognized by law'. 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. [Vendor Code of Conduct_web,
A.1.2.b	Commitment to respect the human rights of workers: Health and safety and working hours	0.5	<ul> <li>106_2022: tjx.com]</li> <li>The individual elements of the assessment are met or not as follows:</li> <li>Score 1</li> <li>Met: Commitment to respect H&amp;S of workers: The Global Code of Conduct indicates: 'We follow safety policies and procedures to protect and preserve the well-being of our Associates and customers. We work hard to provide clean, safe, and accessible facilities for our customers and our fellow Associates and to protect each other and our customers from avoidable injury in the workplace and our stores'. [Global Code of Conduct, 2021: tjx.com]</li> <li>Not Met: Commitment to ILO working hours standards or 48 hour regular work week</li> <li>Score 2</li> <li>Met: Expects suppliers to commit to H&amp;S of workers: The Vendor Code of Conduct indicates: 'Our vendors must provide their workers with safe and healthy conditions, including in any living facilities that may be provided'. [Vendor Code of Conduct_web, 06_2022: tjx.com]</li> <li>Not Met: Expects suppliers to commit to ILO working hours standards or 48 hour regular work week: The Global Code of Conduct indicates: 'Our vendors must provide their workers with safe and healthy conditions, including in any living facilities that may be provided'. [Vendor Code of Conduct_web, 06_2022: tjx.com]</li> <li>Not Met: Expects suppliers to commit to ILO working hours standards or 48 hour regular work week: The Global Code of Conduct indicates: 'Our vendors must not require their employees, on a regularly-scheduled basis, to work in excess of 60 hours per week (or fewer hours if prescribed by applicable laws and regulations). All overtime must be voluntary and must be fully compensated in accordance with the requirements of local law, and except in extraordinary circumstances, employees must be entitled to at least one day of rest in every seven-day period'. However, no formal commitment about respecting the ILO conventions on working hours was found. Alternatively, the Company would achieve this by committing to a 48 hours regular working week, and co</li></ul>
A.1.3.AP	Commitment to respect human rights particularly relevant to the sector – vulnerable groups (AP)	0.5	The individual elements of the assessment are met or not as follows: Score 1 • Met: Commitment to women's rights: The Vendor Code of Conduct indicates: 'We are committed to respecting the rights of all workers, including the rights of women and children, who can be especially vulnerable in the retail manufacturing supply chain'. Although it is a suppliers' document, it contains a Company's commitment. [Vendor Code of Conduct_web, 06_2022: tjx.com] • Met: Commitment to children's rights: See above. [Vendor Code of Conduct_web, 06_2022: tjx.com] • Not Met: Expects suppliers to respect these rights

Indicator Code	Indicator name	Score (out of 2)	Explanation
			Score 2 • Not Met: Commitment refers to CEDAW/Women's Empowerment Principles • Not Met: Commitment refers to Child Rights Convention/Business Principles • Not Met: Commitment refers to Convention on migrant workers • Not Met: Expects suppliers to respect these rights
A.1.4	Commitment to remedy	0	The individual elements of the assessment are met or not as follows: Score 1 • Not Met: Commitment to remedy adverse HRs impacts • Not Met: Expects suppliers to make this commitment Score 2 • Not Met: Commitment to collaborate with judicial or non-judicial mechanisms • Not Met: Commitment to work with suppliers on remedy
A.1.5	Commitment to respect the rights of human rights defenders	0	The individual elements of the assessment are met or not as follows: Score 1 • Not Met: Zero tolerance of threats/attacks on HRDs • Not Met: Expects suppliers to make this commitment Score 2 • Not Met: Commitment to working with HRDs to create safe and enabling environment

### A.2 Board Level Accountability (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.2.1	Commitment from the top	0	<ul> <li>The individual elements of the assessment are met or not as follows:</li> <li>Score 1</li> <li>Not Met: Board level responsibility for HRs</li> <li>Not Met: Describes HRs expertise of Board member</li> <li>Score 2</li> <li>Not Met: Board member/CEO signal importance of HRs in their communications</li> </ul>
A.2.2	Board responsibility	0	The individual elements of the assessment are met or not as follows: Score 1 • Not Met: Process to review HRs strategy at board level • Not Met: Example of HRs issues/trends discussed in last reporting period Score 2 • Not Met: Meets both requirements under score 1 • Not Met: Describes how affected stakeholders / HRs experts inform board discussions
A.2.3	Incentives and performance management	0	<ul> <li>The individual elements of the assessment are met or not as follows:</li> <li>Score 1</li> <li>Not Met: At least one board member incentive linked to HRs commitments</li> <li>Not Met: Incentive scheme linked to key HRs risks beyond employee H&amp;S</li> <li>Score 2</li> <li>Not Met: Performance criteria linked to HRs made public</li> <li>Not Met: Review of other board incentives for coherence with HRs policies</li> </ul>
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 business model and strategy for HRs risks • Not Met: Describes frequency and triggers for reviewing business model Score 2 • Not Met: Meets both requirements under score 1 • Not Met: Example of actions resulting from reviews

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

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.1	Responsibility and resources for day-to-day human rights functions	0	The individual elements of the assessment are met or not as follows: Score 1 • Not Met: Score of 1 on A.1.2.a • Not Met: Senior responsibility for HRs implementation and decision making Score 2 • Not Met: Describes day-to-day responsibility for implementing HRs commitments • Not Met: Day-to-day resources and expertise allocation in own operations • Not Met: Resources and expertise allocation in 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 linked to HRs commitments

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul> <li>Not Met: Incentive scheme linked to key HRs risks beyond employee H&amp;S Score 2</li> <li>Not Met: Performance criteria linked to HRs made public</li> <li>Not Met: Review of other senior management incentives for coherence with HRs policies</li> </ul>
B.1.3	Integration with enterprise risk management	0	<ul> <li>The individual elements of the assessment are met or not as follows:</li> <li>Score 1</li> <li>Not Met: HRs risks integrated as part of enterprise risk system</li> <li>Not Met: Provides an example</li> <li>Score 2</li> <li>Not Met: Risk assesment by Audit Committee or independent third party</li> </ul>
B.1.4.a	Communication /dissemination of policy commitment(s) to workers and external stakeholders	0	<ul> <li>Not Met: Misk assessment by Addit Committee of Independent third party</li> <li>The individual elements of the assessment are met or not as follows:</li> <li>Score 1</li> <li>Not Met: Score of 1 on A.1.2.a</li> <li>Not Met: Communicates HRs policies to all workers in own operations</li> <li>Score 2</li> <li>Not Met: Communicates HRs policies to stakeholders</li> <li>Not Met: Example of how HRs policies are accessible for intended audience</li> </ul>
B.1.4.b	Communication /dissemination of policy commitment(s) to business relationships	0.5	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 • Not Met: Describes steps to communicate HRs policies to supply chain: The Company states that it requires its buying agents to disseminate the Vendor Code of Conduct, which comprises human rights, to their entire TJX vendor base and have it posted to its vendor website, which is available to all vendors. However, no description of this dissemination process was found. Further, it is unclear whether the Code is communicated further down the supply chain (including to indirect suppliers). [2022 Corporate Responsibility Report, 2022: tjx.com] • Not Met: Requires suppliers to communicate HRs policies: The Company states that it requires its buying agents to disseminate the Vendor Code of Conduct, which comprises human rights, to their entire TJX vendor base and have it posted to its vendor website, which is available to all vendors. However, there is no evidence that suppliers are required to communicate the code to their own suppliers. [2022 Corporate Responsibility Report, 2022: tjx.com] Score 2 • Met: Describes how HRs policies are contractual/binding for suppliers: The Company states that its 'purchase order terms and conditions include a requirement for merchandise vendors to adhere to our Vendor Code of Conduct. While the specific requirements contained in the Code were developed with merchandise vendors in mind, we expect all of the companies and individuals with whom we do business to act with integrity and adhere to the basic principles that underlie each Code requirement'. [Vendor Code of Conduct_web, 06_2022: tjx.com] • Not Met: Requires suppliers to cascade contractual/binding HRs policies to its suppliers: The Company indicates that its 'vendors are also required to ensure that any factories or subcontractors they use comply with our Code's principles'. However, it is unclear how suppliers are required to do so (i.e., whether suppliers How
B.1.5	Training on Human Rights	0.5	The individual elements of the assessment are met or not as follows: Score 1 • Not Met: Score of at least 1 on A.1.2.a • Not Met: Describes how workers are trained on HRs policy commitments • Not Met: Trains relevant managers including procurement on HRs: The Company notes that 'TJX Associates involved in the development and buying of merchandise are expected to undergo formal social compliance training biennially. In addition, through informal meetings and discussions, our AVP, Global Social Compliance continues to share our learnings, updating our product development and buying Associates on the requirements of TJX's Global Social Compliance Program. In fiscal 2022, we began expanding our training efforts through new partnerships with external stakeholders. Through our sponsorship of the Responsible Sourcing Network's Yarn Ethically and Sustainably Sourced (YESS) initiative, we were able to offer Associates that support our Global Social Compliance Program access to information sessions about YESS' work assisting mills and spinners in identifying forced labor in their supply chains.' However, it is unclear whether this includes all procurement staff and whether the training includes human rights. [2022 Corporate Responsibility Report, 2022: tjx.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			Score 2 • Not Met: Score of 2 on A.1.2.a • Not Met: Meets both requirements under score 1 • Met: Trains suppliers to meet HRs commitments: The Company indicates that 'We recognize that it is important to routinely train buying agents, vendors, and factory management, and we strongly encourage all new factories in our factory monitoring program to participate in such training. Typically, we hold an average of 10-12 training sessions a year, focusing on various locations around the world that are regionally close to factories included in our factory monitoring program. In fiscal 2022, training sessions have been held in various locations (see map for examples) and have included the following topics: TJX's Vendor Code of Conduct and the expectations contained in this Code we often include targeted training based on geographic or other regional differences to ensure that we are covering the most pertinent topics for each training session, and we may break into focus groups to enhance training through shared learning. Designated representatives at various buying offices around the globe also provide instruction to vendors and factory management on our ethical sourcing expectations.' [2022 Corporate Responsibility Report, 2022: tjx.com]
B.1.6	Monitoring and		Not Met: Discloses % suppliers trained The individual elements of the assessment are met or not as follows:
	corrective actions	0.5	Score 1 • Not Met: Score of at least 1 on A.1.2.a • Not Met: Monitors implementation of HRs policy commitments across global ops and supply chain: The Company indicates that 'factories included in our audit program are required to undergo periodic audits to ensure adherence to our Vendor Code of Conduct and local laws'. These audits generally include one to two full working days at each audited factory, whether in-person or remote, and include interview with factory management; policy, payroll, and documentation review, including confirmation that factory management has verified the ages of job applicants before hiring to protect against potential hiring of child labor; factory walk-through; health and safety inspection; confidential worker interviews; etc. However, no information related to monitoring of the Company's own operations was found. [2022 Corporate Responsibility Report, 2022: tjx.com] • Not Met: Discloses % of supply chain monitored: The Company indicates that it has reviewed more than 2,400+ audits in fiscal 2022. However, no indication of the proportion of the Company's supply chain that was monitored was found. [2022 Corporate Responsibility Report, 2022: tjx.com] • Not Met: Score of 2 on A.1.2.a • Net Met: Describes how workers are involved in monitoring Score 2 • Not Met: Score of 2 on A.1.2.a • Met: Describes corrective actions process: The Company states that 'When a factory receives a needs improvement or unsatisfactory rating, a Corrective Action Plan (CAP) is created and concerns are discussed by the auditors with factory management. A copy of the CAP is provided to factory management to assist them in resolving any violations or deficiencies detected during the audit. To encourage collaboration between our buying agents and vendors, a copy of the CAP is also forwarded to both parties' attention shortly following the audit. TIX receives a copy as well. Factory management is requested to sign the CAP to verify their understanding of the findings. For factories with a needs improvement rati
B.1.7	Engaging and terminating business relationships	0.5	The individual elements of the assessment are met or not as follows: Score 1 • Not Met: HRs performance affects selection suppliers • Met: HRs performance affects continuation supplier relationships: The Company states that its policy is to take appropriate steps regarding a vendor failing to meet the standards set in the Vendor Code, and these steps may include remediation, cancellation of purchase orders, or termination of the business relationship. [2022 Corporate Responsibility Report, 2022: <u>tix.com</u> ]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul> <li>Score 2</li> <li>Not Met: Describes positive HRs incentives for business relationships</li> <li>Met: Works with suppliers to meet HRs requirements: The Company indicates that it provides training to its suppliers. [2022 Corporate Responsibility Report, 2022: tjx.com]</li> </ul>
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: Describes how workers and communities identified and engaged in the last two years • Not Met: Discloses stakeholders whose HRs may be affected • Not Met: Provides two examples of engagement with stakeholders Score 2 • Not Met: Analysis of stakeholder views on company's HRs issues • Not Met: Describes how stakeholders views influenced company's HRs 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	0	<ul> <li>The individual elements of the assessment are met or not as follows:</li> <li>Score 1</li> <li>Not Met: Describes process of identifying risks in own operations</li> <li>Not Met: Describes process for identifying risks in business relationships</li> <li>Score 2</li> <li>Not Met: Describes global risk identification system incl. stakeholder consultation</li> <li>Not Met: Describes how risk identification system is triggered by new circumstances</li> <li>Not Met: Describes risks identified in relation to new circumstances</li> </ul>
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: Describes assessment process and discloses salient HRs risks • Not Met: Describes how process applies to supply chain • Not Met: Public disclosure of results of HRs risk assessment Score 2 • Not Met: Meets all requirements under score 1 • Not Met: Describes how assessment involved affected stakeholders
B.2.3	Integrating and acting on human rights risks and impact assessments	0	The individual elements of the assessment are met or not as follows: Score 1 • Not Met: Describes system to prevent, mitigate and remediate HRs issues • Not Met: Describes how global system applies to supply chain • Not Met: Example of actions decided on at least 1 salient HRs issue Score 2 • Not Met: Meets all requirements under score 1 • Not Met: Describes how stakeholders involved in decisions about actions taken
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: Describes system for evaluation effectiveness of actions • Not Met: Example of lessons learned from evaluation effectiveness of actions Score 2 • Not Met: Meets all requirements under score 1 • Not Met: Involves stakeholders in evaluation effectiveness of actions
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: Describes 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 mechanism(s) for workers       The individual elements of the assessment are met or not as follows:         Score 1       • Met: Grievance mechanism accessible to all workers: The Company indicates t its associates are encouraged to raise any concerns and have multiple channels do so, including an ethics hotline staffed by independent third-party operators. [2022 Corporate Responsibility Report, 2022: tjx.com]	C.1

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul> <li>Score 2</li> <li>Not Met: Grievance mechanism available in appropriate languages and workers made aware</li> <li>Met: Describes how workers in supply chain access grievance mechanism: It is stated that for grievances, external stakeholders, including vendor personnel, may reach the Company via any of the phone numbers or addresses listed by locality on the "contact us" section of the corporate website. The Company also indicates in the Vendor Code of Conduct a website and phone number as grievance channels. [2022 Corporate Responsibility Report, 2022: tix.com] &amp; [Vendor Code of Conduct_web, 06_2022: tix.com]</li> <li>Not Met: Expects suppliers to convey expectation to their suppliers</li> </ul>
C.2	Grievance mechanism(s) for external individuals and communities	1	The individual elements of the assessment are met or not as follows: Score 1 • Met: Grievance mechanism accessible to all external individuals and communities: The Company indicates that the grievance channel is open to all external stakeholders. [2022 Corporate Responsibility Report, 2022: tix.com] Score 2 • Not Met: Grievance mechanism available in appropriate languages and affected stakeholders made aware • Not Met: Describes how external individuals/communities access grievance mechanism: The Company indicates a grievance channel for reports regarding the Vendor Code, however, it is not clear if this channel comprises external stakeholders. [Vendor Code of Conduct_web, 06_2022: tix.com] • Not Met: Expects supplier to convey expectation to their suppliers
C.3	Users are involved in the design and performance of the mechanism(s)	0	<ul> <li>Not Met: Expects supplier to convey expectation to their suppliers</li> <li>The individual elements of the assessment are met or not as follows:</li> <li>Score 1</li> <li>Not Met: Describes how users engaged on design and performance</li> <li>Not Met: Provides user engagement examples (at least two) on design and performance</li> <li>Score 2</li> <li>Not Met: Describes how users engaged on improvement of mechanism</li> <li>Not Met: Provides user engagement examples (at least two) on improvement</li> </ul>
C.4	Procedures related to the mechanism(s) are equitable, publicly available and explained	0	The individual elements of the assessment are met or not as follows: Score 1 • Not Met: Describes procedure and timescales for managing complaints or concerns • Not Met: Describes technical, financial, advisory support to enable equal access Score 2 • Not Met: Describe types of outcome to complainant through use of mechanism • Not Met: Describes escalation to senior levels / independent adjudicators
C.5	Prohibition of retaliation for raising complaints or concerns	0	The individual elements of the assessment are met or not as follows: Score 1 • Not Met: Public statement prohibiting retaliation against workers/stakeholders: The Company states in its Code of Conduct that will not tolerate any form of retaliation or victimization for making good-faith reports or for participating in an investigation or proceeding relating to a complaint, and that anyone who retaliates (or attempts to do so) will be subject to disciplinary action in accordance with Company policies and applicable law. However, it is not clear if this comprises external stakeholders. [Global Code of Conduct, 2021: tix.com] • Not Met: Describes practical measures to prevent retaliation: The Company states in its Code of Conduct that: 'You may remain anonymous when calling the TJX Helpline'. However, it is not clear if this comprises external stakeholders. [Global Code of Conduct, 2021: tix.com] Score 2 • Not Met: Specifies no legal action, firing or violence • Not Met: Expects suppliers to prohibit retaliation against workers/stakeholders
C.6	Company involvement with state- based judicial and non- judicial grievance mechanisms	0	<ul> <li>The individual elements of the assessment are met or not as follows:</li> <li>Score 1</li> <li>Not Met: Complainants not asked to waive legal rights</li> <li>Not Met: Does not require confidentiality provisions</li> <li>Score 2</li> <li>Not Met: Cooperates with state based non judicial mechanisms</li> <li>Not Met: Example of issue resolved (if applicable)</li> </ul>
C.7	Remedying adverse impacts	0	The individual elements of the assessment are met or not as follows: Score 1 • Not Met: Describes approach taken to remedy adverse HRs impacts

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul> <li>Not Met: Describes how remedy would be provided if no adverse impact identified</li> <li>Score 2</li> <li>Not Met: Describes changes to systems, processes and practices to prevent future impacts</li> <li>Not Met: Describes approach to monitoring/implementing agreed remedy</li> <li>Not Met: Describes approach to learning from incidents if no adverse impacts identified</li> </ul>
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: Discloses number of grievances filed, addressed or resolved and outcomes achieved • Not Met: Example of how lessons from mechanism improved HRs management system Score 2 • Not Met: Describes process to evaluate mechanism and changes made as a result • Not Met: Decribes procedures to address delays of outcomes agreed with stakeholders

# D. Performance: Company Human Rights Practices (25% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.2.1.a	Living wage (in own production or		The individual elements of the assessment are met or not as follows:
			Score 1
			<ul> <li>Not Met: Pays living wage or sets time-bound target</li> </ul>
		0	Not Met: Describes how living wage determined
	manufacturing		Score 2
	operations)		Not Met: Achieved paying a living wage
			Not Met: Reviews definition living wage with unions
D.2.1.b	Living wage (in		The individual elements of the assessment are met or not as follows:
	the supply		Score 1
			• Not Met: Requirements on living wage in supplier codes and contracts: The
	chain)		Company states in its Vendor Code of Conduct that 'Our vendors must abide by all
			applicable laws relating to wages and benefits, and must pay the legally prescribed
			minimum wage or higher. Workers must be provided with a written contract which
			clearly describes their employment and wage terms prior to acceptance of
		0	employment. Our vendors must not make any deductions from wages as a
			disciplinary measure.' However, there is nothing related to living wage. [Vendor
			Code of Conduct_web, 06_2022: tjx.com]
			Not Met: Describes work with suppliers on living wage
			Score 2
			Not Met: Assessment of scope of payment below living wage in supply chain
			Not Met: Analysis of trends demonstrating progress
D.2.2	Aligning		The individual elements of the assessment are met or not as follows:
0.2.2			Score 1
	purchasing decisions with human rights	0	Not Met: Describes practices to avoid price or short notice requirements that
			undermine HRs
			Not Met: Describes practices to pay suppliers in line with agreed timeframes
			Not Met: Reviews own operations to mitigate negative impact of purchasing
			practices
			Score 2
			Not Met: Meets all requirements under score 1
			Not Met: Example of assessing and changing of purchasing practices
D.2.3	Manning and		The individual elements of the assessment are met or not as follows:
D.2.3	Mapping and disclosing the supply chain	0	Score 1
			Not Met: Identifies direct and indirect suppliers including manufacturing sites
			Score 2
			Not Met: Discloses names and locations of significant parts of supply chain and
			how significance was defined
			•
D 2 4 a	Duchibition of		Not Met: Discloses direct or indirect suppliers involved in higher-risk activities The individual elements of the assessment are met or not as follows:
D.2.4.a	Prohibition of		
	child labour:	0	Score 1
	Age verification		Not Met: Indicates it does not use child labour
	and corrective		Not Met: Age verification of recruited workers
	actions (in own		Score 2
	production or		Not Met: Remediation if child labour found in operations
	manufacturing		
	operations)		

Indicator Code	Indicator name	Score (out of 2)	Explanation
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: Requirements on child labour in supplier codes and contracts: The
	and corrective		Company states in its Vendor Code of Conduct that vendors must not use child
	actions (in the		labor, and that the term "child" is defined as anyone younger than 15 years of age
			(or younger than 14 years of age where the law of the country of manufacture
	supply chain)		allows 14-year-olds to work). It also states that at all times the vendors must
			respect compulsory education laws and workers under the age of 18 must not
		0	perform hazardous work. The Company indicates that in its audits it looks for
		0	confirmation that the factory management has verified the ages of job applicants
			before hiring. However, this was not found as a requirement in the Code. No
			information was found regarding participation in remediation programs. [Vendor
			Code of Conduct_web, 06_2022: tix.com] & [2022 Corporate Responsibility Report,
			2022: <u>tjx.com</u> ]
			<ul> <li>Not Met: Describes work with suppliers on eliminating child labour</li> </ul>
			Score 2
			<ul> <li>Not Met: Assessment of scope of child labour in supply chain</li> </ul>
			<ul> <li>Not Met: Analysis of trends demonstrating progress</li> </ul>
D.2.5.a	Prohibition of		The individual elements of the assessment are met or not as follows:
	forced labour:		Score 1
	Recruitment		<ul> <li>Not Met: Job seekers/workers do not pay recruitment fee</li> </ul>
	fees and costs		<ul> <li>Not Met: Commitment to fully reimburse recruitment fees paid</li> </ul>
	(in own	0	Score 2
	•		• Not Met: Describes implementation and monitoring in own operations, incl.
	production or		service providers
	manufacturing		
	operations)		
D.2.5.b	Prohibition of		The individual elements of the assessment are met or not as follows:
	forced labour:		Score 1
	Recruitment		<ul> <li>Not Met: Requirements on debt/fees in supplier codes and contracts: The</li> </ul>
	fees and costs		Company states that its vendors must reimburse their workers for any recruitment
	(in the supply		or hiring fees that are paid. However, it is not clear whether the Company prohibits
	chain)	0	the suppliers and third parties from imposing a financial burden in the first place.
	chany		[Vendor Code of Conduct_web, 06_2022: tix.com]
			Not Met: Describes work with suppliers on debt/fees for job seekers/workers
			Score 2
			Not Met: Assessment scope of payment of recruitment fees in supply chain
			Not Met: Analysis of trends demonstrating progress
D.2.5.c	Prohibition of		The individual elements of the assessment are met or not as follows:
	forced labour:		Score 1
	Wage practices		Not Met: Pays workers regularly, in full and on time
	(in own	0	Not Met: Payslip workers shows wages and legitimate deductions
	production or		Score 2
	manufacturing		Not Met: Describes implementation and monitoring in own operations, incl.
	operations)		service providers
D.2.5.d	Prohibition of		The individual elements of the assessment are met or not as follows:
D.2.J.u	forced labour:		Score 1
			• Not Met: Requirements on paying in full and on time in supplier codes and
	Wage practices	1	
	/		contracts
	(in the supply		contracts <ul> <li>Not Met: Describes work with suppliers on paying workers regularly, in full and</li> </ul>
	(in the supply chain)	0	• Not Met: Describes work with suppliers on paying workers regularly, in full and
		0	
		0	<ul> <li>Not Met: Describes work with suppliers on paying workers regularly, in full and on time Score 2</li> </ul>
		0	<ul> <li>Not Met: Describes work with suppliers on paying workers regularly, in full and on time</li> </ul>
		0	<ul> <li>Not Met: Describes work with suppliers on paying workers regularly, in full and on time</li> <li>Score 2</li> <li>Not Met: Assessment scope of failure to pay workers in full and on time in supply chain</li> </ul>
D25e	chain)	0	<ul> <li>Not Met: Describes work with suppliers on paying workers regularly, in full and on time</li> <li>Score 2</li> <li>Not Met: Assessment scope of failure to pay workers in full and on time in supply chain</li> <li>Not Met: Analysis of trends demonstrating progress</li> </ul>
D.2.5.e	chain) Prohibition of	0	<ul> <li>Not Met: Describes work with suppliers on paying workers regularly, in full and on time</li> <li>Score 2</li> <li>Not Met: Assessment scope of failure to pay workers in full and on time in supply chain</li> <li>Not Met: Analysis of trends demonstrating progress</li> <li>The individual elements of the assessment are met or not as follows:</li> </ul>
D.2.5.e	chain) Prohibition of forced labour:	0	<ul> <li>Not Met: Describes work with suppliers on paying workers regularly, in full and on time</li> <li>Score 2</li> <li>Not Met: Assessment scope of failure to pay workers in full and on time in supply chain</li> <li>Not Met: Analysis of trends demonstrating progress</li> <li>The individual elements of the assessment are met or not as follows:</li> <li>Score 1</li> </ul>
D.2.5.e	chain) Prohibition of forced labour: Restrictions on	0	<ul> <li>Not Met: Describes work with suppliers on paying workers regularly, in full and on time</li> <li>Score 2</li> <li>Not Met: Assessment scope of failure to pay workers in full and on time in supply chain</li> <li>Not Met: Analysis of trends demonstrating progress</li> <li>The individual elements of the assessment are met or not as follows:</li> <li>Score 1</li> <li>Not Met: Does not retain documents or restrict movement of workers</li> </ul>
D.2.5.e	chain) Prohibition of forced labour: Restrictions on workers (in		<ul> <li>Not Met: Describes work with suppliers on paying workers regularly, in full and on time</li> <li>Score 2</li> <li>Not Met: Assessment scope of failure to pay workers in full and on time in supply chain</li> <li>Not Met: Analysis of trends demonstrating progress</li> <li>The individual elements of the assessment are met or not as follows:</li> <li>Score 1</li> <li>Not Met: Does not retain documents or restrict movement of workers</li> <li>Score 2</li> </ul>
D.2.5.e	chain) Prohibition of forced labour: Restrictions on	0	<ul> <li>Not Met: Describes work with suppliers on paying workers regularly, in full and on time</li> <li>Score 2</li> <li>Not Met: Assessment scope of failure to pay workers in full and on time in supply chain</li> <li>Not Met: Analysis of trends demonstrating progress</li> <li>The individual elements of the assessment are met or not as follows:</li> <li>Score 1</li> <li>Not Met: Does not retain documents or restrict movement of workers</li> <li>Score 2</li> <li>Not Met: Describes implementation and monitoring in own operations, incl.</li> </ul>
D.2.5.e	chain) Prohibition of forced labour: Restrictions on workers (in		<ul> <li>Not Met: Describes work with suppliers on paying workers regularly, in full and on time</li> <li>Score 2</li> <li>Not Met: Assessment scope of failure to pay workers in full and on time in supply chain</li> <li>Not Met: Analysis of trends demonstrating progress</li> <li>The individual elements of the assessment are met or not as follows:</li> <li>Score 1</li> <li>Not Met: Does not retain documents or restrict movement of workers</li> <li>Score 2</li> </ul>
D.2.5.e	chain) Prohibition of forced labour: Restrictions on workers (in own production		<ul> <li>Not Met: Describes work with suppliers on paying workers regularly, in full and on time</li> <li>Score 2</li> <li>Not Met: Assessment scope of failure to pay workers in full and on time in supply chain</li> <li>Not Met: Analysis of trends demonstrating progress</li> <li>The individual elements of the assessment are met or not as follows:</li> <li>Score 1</li> <li>Not Met: Does not retain documents or restrict movement of workers</li> <li>Score 2</li> <li>Not Met: Describes implementation and monitoring in own operations, incl.</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.2.5.f	Prohibition of	. ,	The individual elements of the assessment are met or not as follows:
	forced labour:		Score 1
	Restrictions on		Met: Requirements on free movement in supplier codes and contracts: The
	workers (in the		Company states that its vendors must not use voluntary or involuntary prison labor,
	supply chain)		indentured labor, bonded labor, labor acquired through slavery or human
	supply chain		trafficking, or any forms of involuntary or forced labor and must not require
		0.5	workers to surrender any identity papers as a condition of employment; such
			documents may only be temporarily held to verify a worker's employment
			eligibility. [Vendor Code of Conduct_web, 06_2022: tjx.com]
			• Not Met: Describes working with suppliers on free movement of workers
			Score 2
			<ul> <li>Not Met: Assessment of scope of restriction of movement in supply chain</li> <li>Not Met: Analysis of trends demonstrating progress</li> </ul>
D.2.6.a	Freedom of		The individual elements of the assessment are met or not as follows:
D.2.0.d			Score 1
	association and		Not Met: Commits to measures prohibiting interference with trade unions
	collective		Not Met: Discloses % total workforce covered by CB agreements
	bargaining (in	0	Score 2
	own production	C C	Not Met: Meets both requirements under score 1
	or		
	manufacturing		
	operations)		
D.2.6.b	Freedom of		The individual elements of the assessment are met or not as follows:
	association and		Score 1
	collective		<ul> <li>Not Met: Requirements on FoA/CB in suppliers codes and contracts: The</li> </ul>
	bargaining (in		Company states that its vendors must respect the rights of their workers to choose
	the supply		(or choose not) to freely associate and to bargain collectively where such rights are
	chain)		recognized by law and that it prohibits harassment, retaliation, and violence
	Chain)	0	against trade union members and representatives. However, no information was
			found o whether the Company requires suppliers to respect those rights under all
			circumstances. [Vendor Code of Conduct_web, 06_2022: tjx.com]
			Not Met: Describes work with suppliers on FoA/CB
			Score 2
			Not Met: Assessment of scope of restriction of FoA/CB in supply chain
<b>D D D D</b>			Not Met: Analysis of trends demonstrating progress
D.2.7.a	Health and		The individual elements of the assessment are met or not as follows:
	safety:		Score 1 <ul> <li>Not Met: Describes process to identify H&amp;S risks and impacts</li> </ul>
	Fatalities, lost		Not Met: Discloses injury rate or lost days for own workers in last reporting
	days, injury,		period
	occupational		Not Met: Discloses fatalities for own workers in last reporting period
	disease rates	0	Not Met: Discloses accupational disease rate for own workers in last reporting
	(in own		period
	production of		Score 2
	manufacturing operations)		Not Met: Sets targets for H&S performance
			<ul> <li>Not Met: Met targets or explains why not or how improve H&amp;S management</li> </ul>
	operations		systems
D.2.7.b	Health and		The individual elements of the assessment are met or not as follows:
	safety:		Score 1
	Fatalities, lost		• Not Met: Requirements on H&S in supplier codes and contracts: The Company
			states that its vendors must provide their workers with safe and healthy conditions,
	days, injury,		including in any living facilities that may be provided and that all appropriate
	occupational		measures must be in place to safeguard the health and safety of workers in the
	disease rates		event of a fire. However, no specific and clear requirements were found. [Vendor
	(in the supply		Code of Conduct_web, 06_2022: tjx.com]
	chain)	0	• Not Met: Discloses injury rate or lost days in supply chain in last reporting period
			• Not Met: Discloses fatalities for workers in supply chain in last reporting period
			<ul> <li>Not Met: Discloses occupational disease rate in supply chain in last reporting</li> </ul>
			period
			Score 2
			<ul> <li>Not Met: Describes work with suppliers of H&amp;S</li> </ul>
			<ul> <li>Not Met: Assessment of scope of H&amp;S issues in supply chain</li> </ul>
			<ul> <li>Not Met: Analysis of trends demonstrating progress</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.2.8.a	Women's rights		The individual elements of the assessment are met or not as follows:
	(in own		Score 1
	production or		• Not Met: Describes processes to stop harassment and violence against women:
			The Company indicates that it does do not tolerate harassment, which may include
	manufacturing		any verbal or physical conduct based on an individual's protected status that
	operations)		unreasonably interferes with their work performance or creates an intimidating,
			hostile, or otherwise offensive environment. It also states that harassment can take
			many forms, as remarks, slurs, or jokes that are demeaning or offensive based on a
			legally protected status, sexual advances, requests for sexual favors, verbal or
			physical conduct of a sexual or otherwise inappropriate nature, etc, but regardless
			of the form it takes or where it occurs, behavior like this is not tolerated. In
			addition, the Company states that; 'Talk to a manager or Human Resources, or
			contact the TJX Helpline, if you have any concerns. If you are a supervisor,
		0	manager, or executive, and hear an allegation of harassing behavior, you must
			promptly notify Human Resources'. However, no information was found on how
			the Company addresses this issue outside of individual complaints. [Global Code of
			Conduct, 2021: tjx.com]
			Not Met: Working conditions take into account gender issues
			Not Met: Measures and steps to address gender pay gap at all levels of
			employment: The Company states that it is firmly committed to pay equity, and
			that, according to 2021 data, in the United States, on average, there was no
			meaningful differences in base pay between Associates based on gender or
			race/ethnicity. However, no description of how it measures and takes steps to
			address any gender pay gap was found. [2022 Corporate Responsibility Report,
			2022: <u>tjx.com</u> ]
			Score 2
			Not Met: Meets all requirements under score 1
			Not Met: Analysis of trends demonstrating progress closing gender pay gap
D.2.8.b	Women's rights		The individual elements of the assessment are met or not as follows:
	(in the supply chain)		Score 1
			Not Met: Requirements on women's rights in contracts/codes with suppliers
		0	<ul> <li>Not Met: Describes work with suppliers on women's rights</li> </ul>
		Ũ	Score 2
			Not Met: Assessment of scope of unsafe working conditions/discrimination
			against women in supply chain
			Not Met: Analysis of trends demonstrating progress
D.2.9.a	Working hours		The individual elements of the assessment are met or not as follows:
	(in own		Score 1
	production or		<ul> <li>Not Met: Respects HRs regarding working hours/breaks/rest</li> </ul>
	manufacturing	0	• Not Met: Assesses ability of workers to comply with working hours commitments
	operations)		when allocating work
	operations		Score 2
			Not Met: Describes implementation and monitoring in own operations
D.2.9.b	Working hours		The individual elements of the assessment are met or not as follows:
	(in the supply chain)		Score 1
			• Not Met: Requirements on working hours in codes/contracts with suppliers: The
			Company states that its vendors must not require their employees, on a regularly-
	0		scheduled basis, to work in excess of 60 hours per week (or fewer hours if
			prescribed by applicable laws and regulations). All overtime must be voluntary and
		0	must be fully compensated in accordance with the requirements of local law, and
		0	except in extraordinary circumstances, employees must be entitled to at least one
		day of rest in every seven-day period. However, these requirements do not meet	
			the international standards. [Vendor Code of Conduct_web, 06_2022: tjx.com]
			Not Met: Describes work with suppliers on working hours
			Score 2
			• Not Met: Assesment of scope of excessive working hours in supply chain

# 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		No allegations meeting the CHRB severity threshold were found, and so the score of 4.85 out of 80 points scored in themes A-D has been applied to produce a score of 1.21 out of 20 points for theme E.

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