

**Corporate Human Rights Benchmark  
2023 Company Scorecard**

**Company name** Target Corporation  
**Sector** Food and agricultural products & Apparel (supply chain only)  
**Overall score** 17.3 out of 100

| Theme score | Out of | For theme   |
|-------------|--------|---|
| 2.1         | 10     | A. Governance and Policy Commitments                |
| 6.1         | 25     | B. Embedding Respect and Human Rights Due Diligence |
| 4.5         | 20     | C. Remedies and Grievance Mechanisms                |
| 3.3         | 25     | D. Performance: Company Human Rights Practices      |
| 1.3         | 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  | 2                | The individual elements of the assessment are met or not as follows:<br>Score 1<br><ul style="list-style-type: none"> <li>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: <a href="https://corporate.target.com">corporate.target.com</a>]</li> </ul> Score 2<br><ul style="list-style-type: none"> <li>Met: Commitment to 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: <a href="https://corporate.target.com">corporate.target.com</a>]</li> </ul>   |
| 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:<br>Score 1<br><ul style="list-style-type: none"> <li>Met: Commitment to ILO core principles: 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: <a href="https://corporate.target.com">corporate.target.com</a>]</li> <li>Not Met: Explicitly lists all four ILO core principles: 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 associate with any group,</li> </ul> |

| Indicator Code | Indicator name   | Score (out of 2) | Explanation  |
|----------------|--|------------------|--|
|                |  |                  | <p>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'. No further details found during last revision. [Code of Ethics, 06/2021: <a href="https://corporate.target.com">corporate.target.com</a>] &amp; [Human Rights Statement_web, N/A: <a href="https://corporate.target.com">corporate.target.com</a>]</p> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Expects suppliers to commit to ILO core principles</li> <li>• Not Met: Explicitly lists all four ILO core principles 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 Partner Code of Conduct, N/A: <a href="https://corporate.target.com">corporate.target.com</a>]</li> </ul>  |
| A.1.2.b        | Commitment to respect the human rights of workers: Health and safety and working hours   | 0.5              | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Commitment to respect H&amp;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: <a href="https://corporate.target.com">corporate.target.com</a>]</li> <li>• Not Met: Commitment to ILO working hours standards or 48 hour regular work week</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Expects suppliers to commit to H&amp;S of workers: The Business Partner Code of Conduct indicates: 'Suppliers must provide a safe and healthy working environment for workers. We expect hazards to be assessed and appropriate safeguards to be implemented, monitored, and trained to workers to prevent accidents, injuries, and illnesses'. [Business Partner Code of Conduct, N/A: <a href="https://corporate.target.com">corporate.target.com</a>]</li> <li>• Met: Expects suppliers to commit to ILO working hours standards or 48 hour regular work week: The Business Partner Code of Conduct indicates: '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 or six consecutive days. 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: <a href="https://corporate.target.com">corporate.target.com</a>]</li> </ul> |
| A.1.3.a.AG     | Commitment to respect human rights particularly relevant to the sector – land, natural resources and indigenous peoples' rights (AG) | 0                | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Commitment to respect land ownership/natural resources as in VGGT</li> <li>• Not Met: Commitment to respect land ownership/natural resources as in IFC Performance Standards</li> <li>• Not Met: Commitment to respect indigenous rights or ILO No.169 or UN Declaration</li> <li>• Not Met: Expects suppliers to make these commitments</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Commitment to respect the right to water</li> <li>• Not Met: Commitment to obtain FPIC or zero tolerance to land grabbing</li> <li>• Not Met: Expects suppliers to make these commitments: It indicates on its Human Rights Statement: 'We do our part to ensure that workers have decent working conditions, including validating that clean, drinkable water and sanitation</li> </ul>   |

| Indicator Code | Indicator name  | Score (out of 2) | Explanation   |
|----------------|---|------------------|---|
|                |   |                  | <p>are accessible for the workers in Target’s supply chain’. It is not clear the Company suppliers to commit to respect the water to water and to respect ownership/use of land and natural resources also to include a commitment to obtain the free prior and informed consent (FPIC) from indigenous peoples and local communities for transaction(s) involving land and natural resources or to a zero tolerance for land grabbing. Moreover, although the Company indicates that it will validate that water and sanitation are accessible for the workers at its supply chain, it is not clear it expects suppliers to commit to the right to water. [Human Rights Statement_web, N/A: <a href="http://corporate.target.com">corporate.target.com</a>]</p>  |
| A.1.3.b.AG     | Commitment to respect human rights particularly relevant to the sector – vulnerable groups (AG) | 0.5              | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Commitment to women's rights: The Human Rights Statement indicates: ‘We are committed to respecting the human rights of workers within Target’s supply chain, especially at-risk groups including women, young workers, domestic migrant workers and foreign contract workers’. However, no details found of commitment regarding its own operations. [Human Rights Statement_web, N/A: <a href="http://corporate.target.com">corporate.target.com</a>]</li> <li>• Not Met: Commitment to children's rights</li> <li>• Not Met: Commitment to migrant worker's rights: The Human Rights Statement indicates: ‘We are committed to respecting the human rights of workers within Target’s supply chain, especially at-risk groups including women, young workers, domestic migrant workers and foreign contract workers’. However, no details found of commitment regarding its own operations. However, no details found of commitment regarding its own operations. [Human Rights Statement_web, N/A: <a href="http://corporate.target.com">corporate.target.com</a>]</li> <li>• 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 &amp; Human Rights Policies_web, N/A: <a href="http://corporate.target.com">corporate.target.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Commitment refers to CEDAW/Women's Empowerment Principles</li> <li>• Not Met: Commitment refers to Child Rights Convention/Business Principles</li> <li>• Not Met: Commitment refers to Convention on migrant workers</li> <li>• Not Met: Expects suppliers to respect these rights</li> </ul> |
| A.1.3.AP       | Commitment to respect human rights particularly relevant to the sector – vulnerable groups (AP) | 0.5              | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Commitment to women's rights: The Human Rights Statement indicates: ‘We are committed to respecting the human rights of workers within Target’s supply chain, especially at-risk groups including women, young workers, domestic migrant workers and foreign contract workers’. However, no details found of commitment regarding its own operations. [Human Rights Statement_web, N/A: <a href="http://corporate.target.com">corporate.target.com</a>]</li> <li>• Not Met: Commitment to children's rights</li> <li>• Not Met: Commitment to migrant worker's rights: The Human Rights Statement indicates: ‘We are committed to respecting the human rights of workers within Target’s supply chain, especially at-risk groups including women, young workers, domestic migrant workers and foreign contract workers’. However, no details found of commitment regarding its own operations. [Human Rights Statement_web, N/A: <a href="http://corporate.target.com">corporate.target.com</a>]</li> <li>• 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 views and comply’. [Supply Chain Labor &amp; Human Rights Policies_web, N/A: <a href="http://corporate.target.com">corporate.target.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Commitment refers to CEDAW/Women's Empowerment Principles</li> <li>• Not Met: Commitment refers to Child Rights Convention/Business Principles</li> </ul>  |

| Indicator Code | Indicator name   | Score (out of 2) | Explanation   |
|----------------|--|------------------|---|
|                |  |                  | <ul style="list-style-type: none"> <li>• Not Met: Commitment refers to Convention on migrant workers</li> <li>• Not Met: Expects suppliers to respect these rights</li> </ul>   |
| A.1.4          | Commitment to remedy                                       | 0                | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Commitment to remedy adverse HRs impacts: The Human Rights Statement 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. We are continuously working to do better and improve our impact. However, if adverse impacts arise, our approach focuses on mitigation and remediation through effective remedies'. 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: <a href="http://corporate.target.com">corporate.target.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Commitment to collaborate with judicial or non-judicial mechanisms: Regarding its zero-tolerance policy for underage labour, the Supply Chain Labor &amp; 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'. In the context to its grievance mechanisms, it adds: 'In some cases, we will partner with globally recognized nonprofit organizations such as Verité, Impactt and The Centre for Child Rights and Business, to support capability building and remediation of complex workplace human rights issues, to be sure that we are providing the most effective solution'. However, no commitment found to collaborating with judicial or non-judicial mechanisms to provide access to remedy beyond apparel and rug industries. [Human Rights Statement_web, N/A: <a href="http://corporate.target.com">corporate.target.com</a>]</li> <li>• Not Met: Commitment to work with suppliers on remedy: The Human Rights Statement indicates: 'In the event that a grievance is identified as founded, Target will engage with its business partners to remediate any and all adverse impacts'. However, no commitment to work with suppliers to remedy adverse impacts which are directly linked to the Company's operations, products or services beyond finding through the grievance channel. [Human Rights Statement_web, N/A: <a href="http://corporate.target.com">corporate.target.com</a>]</li> </ul> |
| A.1.5          | Commitment to respect the rights of human rights defenders | 0                | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Zero tolerance of threats/attacks on HRDs</li> <li>• Not Met: Expects suppliers to make this commitment</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Commitment to working with HRDs to create safe and enabling environment</li> </ul>   |

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

| Indicator Code | Indicator name          | Score (out of 2) | Explanation  |
|----------------|-------------------------|------------------|--|
| A.2.1          | Commitment from the top | 0.5              | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Board level responsibility for HRs: The Human Rights Statement indicates: 'The full Board of Directors and its Committees have oversight roles over different aspects of human rights. The full Board oversees overall sustainability and ESG strategy, including the organizational team health aspect of human rights. The Governance &amp; Sustainability Committee oversees external reporting on the topic. The Audit &amp; Risk Committee oversees our compliance and ethics programs and supply chain ESG matters, including vendor human capital and responsible sourcing practices. The Compensation &amp; Human Capital Management Committee oversees a variety of human rights topics, including DE&amp;I, culture and employee engagement, pay equity, broad-based compensation and benefits, growth and development, and purpose and values and culture'. [Human Rights Statement_web, N/A: <a href="http://corporate.target.com">corporate.target.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Describes HRs expertise of Board member</li> <li>• Not Met: Board member/CEO signal importance of HRs in their communications</li> </ul> |
| A.2.2          | Board responsibility    | 0                | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Process to review HRs strategy at board level</li> <li>• Not Met: Example of HRs issues/trends discussed in last reporting period</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Meets both requirements under score 1</li> </ul>  |

| Indicator Code | Indicator name                        | Score (out of 2) | Explanation  |
|----------------|---------------------------------------|------------------|--|
|                |                                       |                  | <ul style="list-style-type: none"> <li>• Not Met: Describes how affected stakeholders / HRs experts inform board discussions</li> </ul>  |
| A.2.3          | Incentives and performance management | 0                | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <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> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <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                | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Board process to review business model and strategy for HRs risks</li> <li>• Not Met: Describes frequency and triggers for reviewing business model</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Meets both requirements under score 1</li> <li>• Not Met: Example of actions resulting from reviews</li> </ul>                                |

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

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

| Indicator Code | Indicator name   | Score (out of 2) | Explanation   |
|----------------|--|------------------|---|
| B.1.1          | Responsibility and resources for day-to-day human rights functions | 0.5              | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Score of 1 on A.1.2.a</li> <li>• Met: Senior responsibility for HRs 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: <a href="https://corporate.target.com">corporate.target.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Describes day-to-day responsibility for implementing HRs commitments: 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: <a href="https://corporate.target.com">corporate.target.com</a>]</li> <li>• Not Met: Day-to-day resources and expertise allocation in own operations</li> <li>• Not Met: Resources and expertise allocation in supply chain</li> </ul>  |
| B.1.2          | Incentives and performance management                              | 0                | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Senior manager incentives linked to HRs commitments</li> <li>• Not Met: Incentive scheme linked to key HRs risks beyond employee H&amp;S</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <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                | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: HRs risks integrated as part of enterprise risk system: Among its Competitive and Reputational Risks, the Company includes: 'Our reputation is based in large part on perceptions, both about us and others with whom we do business, and broad access to social media makes it easy for anyone to provide public feedback that can influence perceptions of Target. It may be difficult to control negative publicity, regardless of whether it is accurate. Target's responses to crises and our position or perceived lack of position on environmental, social, and governance (ESG) matters, such as sustainability, responsible sourcing, and diversity, equity, and inclusion (DE&amp;I), and any perceived lack of transparency about those matters, could harm our reputation'. However, no further details found specifically on how attention to human rights risks is integrated into its broader enterprise risk management system. [2021 Annual Report, 2022: <a href="https://corporate.target.com">corporate.target.com</a>]</li> <li>• Not Met: Provides an example</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Risk assesment by Audit Committee or independent third party</li> </ul> |
| B.1.4.a        | Communication /dissemination of policy commitment(s)               | 0                | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Score of 1 on A.1.2.a</li> <li>• Not Met: Communicates HRs policies to all workers in own operations: Regarding responsible sourcing, the 2022 Environmental, Social and Governance Report</li> </ul>  |

| Indicator Code | Indicator name   | Score (out of 2) | Explanation  |
|----------------|--|------------------|--|
|                | to workers and external stakeholders   |                  | <p>indicates: 'In 2021, our team delivered 17 training programs on this industry-converged approach to 3,155 internal team members and suppliers — more than 6,500 training hours in total'. However, it is not clear it covers all workers. The Company is expected to describe how it communicates its Human Rights commitments to all workers, including in local languages where necessary. [2022 Target Environmental, Social and Governance Report, 2022: <a href="https://corporate.target.com">corporate.target.com</a>]</p> <p>Score 2</p> <ul style="list-style-type: none"> <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                | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Meets ILO requirement for suppliers on A.1.2.a</li> <li>• Not Met: Describes steps to communicate HRs policies to supply chain: The Business Partner Code of Conduct indicates: 'Because we place such a high priority on ethical and legal conduct, all of our domestic and international business partners must read, understand and comply with all expectations outlined in the Business Partner Code of Conduct (BPCC), Standards of Vendor Engagement (SOVE) and all Target requirements'. The webpage section Standards of Vendor Engagement adds: 'We expect our domestic and international suppliers to share those principles and uphold our standards. Suppliers must conduct their business with a high level of integrity and maintain transparent and accurate records. We require all vendors, suppliers, third-party sellers, manufacturers, contractors, subcontractors and their agents (collectively, "suppliers") to abide by the following standards and cascade them through their supply chain'. Both documents contain Human Rights provisions. 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: <a href="https://corporate.target.com">corporate.target.com</a>] &amp; [Standards of Vendor Engagement, N/A: <a href="https://corporate.target.com">corporate.target.com</a>]</li> <li>• Not Met: Requires suppliers to communicate HRs policies</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Describes how HRs policies are contractual/binding for suppliers</li> <li>• Not Met: Requires suppliers to cascade contractual/binding HRs policies to its suppliers</li> </ul>   |
| B.1.5          | Training on Human Rights   | 0.5              | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Score of at least 1 on A.1.2.a</li> <li>• Not Met: Describes how workers are trained on HRs policy commitments: 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'. Regarding responsible sourcing, the 2022 Environmental, Social and Governance Report indicates: 'In 2021, our team delivered 17 training programs on this industry-converged approach to 3,155 internal team members and suppliers — more than 6,500 training hours in total'. However, it is not clear if workers are generally trained on its human rights policy commitments. No further evidence found. [2022 Target Environmental, Social and Governance Report, 2022: <a href="https://corporate.target.com">corporate.target.com</a>] &amp; [2021 Corporate Responsibility Report, N/A: <a href="https://corporate.target.com">corporate.target.com</a>]</li> <li>• Met: Trains relevant managers including procurement on HRs: The Human Rights Statement indicates: 'In 2022, we rolled out our first human rights training to key business areas including merchandising, owned brands, sourcing and corporate responsibility. The training covered our human rights statement and human rights in our business operations, our supply chain'. The 2022 CA Transparency in Supply Chains Act adds: 'Target administers mandatory training for team members responsible for sourcing and merchandising decisions on an array of topics, including Target's Standards and Target's Social Compliance program'. [2022 CA Transparency in Supply Chains Act, 2022: <a href="https://help.target.com">help.target.com</a>] &amp; [Human Rights Statement_web, N/A: <a href="https://corporate.target.com">corporate.target.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Score of 2 on A.1.2.a</li> <li>• Not Met: Meets both requirements under score 1</li> <li>• Not Met: Trains suppliers to meet HRs commitments: The webpage section Responsible Sourcing &amp; Sustainability Audit Program indicates: 'In 2021, our team delivered 17 training programs on this industry-converged approach to 3,155</li> </ul> |

| Indicator Code | Indicator name                                  | Score (out of 2) | Explanation   |
|----------------|---|------------------|---|
|                |   |                  | <p>internal team members and suppliers — more than 6,500 training hours in total’. The Human Rights Statement adds: ‘We empower our suppliers to support their workers through capability building programs, including the Responsible Sourcing Advisory Program, which 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. 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, although the Company describes some specific trainings for suppliers, no evidence found of general human rights training (policy commitments) conducted for suppliers. [2021 Corporate Responsibility Report, N/A: <a href="https://corporate.target.com">corporate.target.com</a>] &amp; [Responsible Sourcing &amp; Sustainability Audit Program_web, N/A: <a href="https://corporate.target.com">corporate.target.com</a>]</p> <ul style="list-style-type: none"> <li>• Not Met: Discloses % suppliers trained</li> </ul>  |
| B.1.6          | Monitoring and corrective actions               | 0.5              | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Score of at least 1 on A.1.2.a</li> <li>• Not Met: Monitors implementation of HRs policy commitments across global ops and supply chain: Regarding social responsibility in its supply chains, the 2021 Corporate Responsibility Report indicates: ‘All facilities that manufacture or convert raw materials into Target owned-brand products, Target-exclusive products, Target-distributed products and/or nationally branded products for which Target is the importer of record, are in scope for Target’s Responsible Sourcing and Sustainability audit program’. The 2022 Environmental, Social and Governance Report adds: ‘Our Responsible Sourcing and Sustainability audit program covers all facilities Note 65 that manufacture or convert raw materials into: Target owned brand products and packaging. Target exclusive products and packaging. Target-distributed products and/or nationally branded products and packaging for which Target is the importer of record. Our risk-based audit 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 regular audits and have them approved by our industry-aligned audit protocol’. However, it is not clear how it monitors the implementation of its human rights policy commitments across its own operations. [2021 Corporate Responsibility Report, N/A: <a href="https://corporate.target.com">corporate.target.com</a>] &amp; [2022 Target Environmental, Social and Governance Report, 2022: <a href="https://corporate.target.com">corporate.target.com</a>]</li> <li>• Met: Discloses % of supply chain monitored: Regarding Labor Conditions in the Supply Chain, the 2022 Environmental, Social and Governance Report indicates: ‘70% Tier 1 supplier facilities audited. 42% Tier 2 supplier facilities and beyond audited. &gt;99% of audits conducted by third-party auditor Target conducted 243 unannounced audits’. [2022 Target Environmental, Social and Governance Report, 2022: <a href="https://corporate.target.com">corporate.target.com</a>]</li> <li>• Not Met: Describes how workers are involved in monitoring</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Score of 2 on A.1.2.a</li> <li>• Met: Describes corrective actions process: The webpage section Responsible Sourcing &amp; Sustainability Audit Program 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 helping the vendor and factory identify the root causes of violations so they don’t recur’. [Responsible Sourcing &amp; Sustainability Audit Program_web, N/A: <a href="https://corporate.target.com">corporate.target.com</a>]</li> <li>• Not Met: Discloses findings and number of correction action processes</li> </ul> |
| B.1.7          | Engaging and terminating business relationships | 0.5              | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: HRs performance affects selection 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</li> </ul>  |

| Indicator Code | Indicator name                                    | Score (out of 2) | Explanation   |
|----------------|---|------------------|---|
|                |   |                  | <p>the selection process. No further details found during last revision. [Code of Ethics, 06/2021: <a href="https://corporate.target.com">corporate.target.com</a>]</p> <ul style="list-style-type: none"> <li>• Met: HRs performance affects continuation 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 webpage section Supplier Engagement states that: 'Vendors who do not meet our standards will be put on probation. [...] If they are not able to consistently meet these requirements, we will remove them from our vendor matrix. We also will terminate a relationship our 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'. Target's SOVE [Standards of Vendor Engagement] contains the Company's Human Rights provisions. [2021 Corporate Responsibility Report, N/A: <a href="https://corporate.target.com">corporate.target.com</a>] &amp; [Supplier Engagement_web, N/A: <a href="https://corporate.target.com">corporate.target.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Works with suppliers to meet HRs requirements: The webpage section Responsible Sourcing &amp; Sustainability Audit Program indicates: 'In 2021, our team delivered 17 training programs on this industry-converged approach to 3,155 internal team members and suppliers — more than 6,500 training hours in total'. The Human Rights Statement adds: 'We empower our suppliers to support their workers through capability building programs, including the Responsible Sourcing Advisory Program, which 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'. According to the 2021 CSR Report: 'Our Responsible Sourcing Advisory Program is another example of how we support our key suppliers on a pathway to continuous improvement. Established in partnership with Better Work, the program focuses on providing soft skills training that helps workers and management solve problems collaboratively using data tracking and social dialogue mechanisms, including worker management committees and grievance systems'. [Responsible Sourcing &amp; Sustainability Audit Program_web, N/A: <a href="https://corporate.target.com">corporate.target.com</a>] &amp; [Human Rights Statement_web, N/A: <a href="https://corporate.target.com">corporate.target.com</a>]</li> </ul> |
| B.1.8          | Approach to engagement with affected stakeholders | 0                | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Describes how workers and communities identified and engaged 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. No further details found during last revision. [ESG Priorities and Stakeholder Engagement_web, N/A: <a href="https://corporate.target.com">corporate.target.com</a>]</li> <li>• Not Met: Discloses stakeholders whose 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. No further details found during last revision. [ESG Priorities and Stakeholder Engagement_web, N/A: <a href="https://corporate.target.com">corporate.target.com</a>]</li> <li>• Not Met: Provides two examples of engagement with stakeholders</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Analysis of stakeholder views on company's HRs issues</li> <li>• Not Met: Describes how stakeholders views influenced company's HRs approach</li> </ul>   |

## 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                | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Describes process of 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: <a href="https://corporate.target.com">corporate.target.com</a>]</li> <li>• Met: Describes process for identifying risks in business relationships: As its stated above, it the HRIAs covers its supply chain. [2021 Corporate Responsibility Report, N/A: <a href="https://corporate.target.com">corporate.target.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Describes global risk identification system incl. stakeholder consultation: The 2022 Environmental, Social and Governance Report indicates: 'In 2022, Target partnered with Article One, an expert business and human rights consultancy, to conduct an updated human rights impact assessment (HRIA) for our operations, supply chain and business relationships. Initially performed in 2019 and informed by stakeholders, the HRIA uncovered key salient risk areas such as wages and working hours. [...] Once a refresh is complete, the HRIA will once again identify salient human rights risks relevant to Target, our team members, guests, supply chain workers and communities. Additionally, it will inform our human rights strategy moving forward, including the specific issues addressed in our Human Rights Statement'. However, it is not clear if current assessment includes consultation with affected stakeholders. [2022 Target Environmental, Social and Governance Report, 2022: <a href="https://corporate.target.com">corporate.target.com</a>]</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   | 1                | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Describes assessment process and discloses salient HRs risks: The 2022 Environmental, Social and Governance Report indicates: 'In 2022, Target partnered with Article One, an expert business and human rights consultancy, to conduct an updated human rights impact assessment (HRIA) for our operations, supply chain and business relationships. Initially performed in 2019 and informed by stakeholders, the HRIA uncovered key salient risk areas such as wages and working hours. [...] Once a refresh is complete, the HRIA will once again identify salient human rights risks relevant to Target, our team members, guests, supply chain workers and communities. Additionally, it will inform our human rights strategy moving forward, including the specific issues addressed in our Human Rights Statement'. The 2021 CSR Report adds: '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: <a href="https://corporate.target.com">corporate.target.com</a>] &amp; [2022 Target Environmental, Social and Governance Report, 2022: <a href="https://corporate.target.com">corporate.target.com</a>]</li> <li>• Not Met: Describes 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. No further details found during last revision. [2021 Corporate Responsibility Report, N/A: <a href="https://corporate.target.com">corporate.target.com</a>]</li> <li>• Met: Public disclosure of results of HRs risk assessment: The 2022 Environmental, Social and Governance Report discloses its Salient human rights impact areas according to stakeholder group. For 'our team members', the key salient risk aspects include: 'Safe working environments'. As for 'Workers in our supply chain: [...] No forced labor; Respecting human rights for all workers in our supply chain, specifically at-risk groups such as women, young workers and foreign contract</li> </ul>  |

| Indicator Code | Indicator name   | Score (out of 2) | Explanation  |
|----------------|--|------------------|--|
|                |  |                  | workers; Safe and healthy working environments, including access to clean water'. Lastly, for 'Our communities: [...] Economic development; Diverse workforce and equitable hiring and development practices'. [2022 Target Environmental, Social and Governance Report, 2022: <a href="https://corporate.target.com">corporate.target.com</a> ]<br>Score 2<br><ul style="list-style-type: none"> <li>• Not Met: Meets all requirements under score 1</li> <li>• Not Met: Describes how assessment involved affected stakeholders</li> </ul>   |
| B.2.3          | Integrating and acting on human rights risks and impact assessments                | 1                | The individual elements of the assessment are met or not as follows:<br>Score 1<br><ul style="list-style-type: none"> <li>• Not Met: Describes system to prevent, mitigate and remediate HRs issues</li> <li>• Not Met: Describes how global system applies to supply chain</li> <li>• Met: Example of actions decided on at least 1 salient HRs issue: The 2022 Environmental, Social and Governance Report indicates: 'the HRIA uncovered key salient risk areas such as wages and working hours. In response, we expanded team member benefits, increased our starting wage rate and offered more flexible work options'. [2022 Target Environmental, Social and Governance Report, 2022: <a href="https://corporate.target.com">corporate.target.com</a>]</li> </ul> Score 2<br><ul style="list-style-type: none"> <li>• Not Met: Meets all requirements under score 1</li> <li>• Not Met: Describes how stakeholders involved in decisions about actions taken</li> </ul> |
| 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:<br>Score 1<br><ul style="list-style-type: none"> <li>• Not Met: Describes system for evaluation effectiveness of actions</li> <li>• Not Met: Example of lessons learned from evaluation effectiveness of actions</li> </ul> Score 2<br><ul style="list-style-type: none"> <li>• Not Met: Meets all requirements under score 1</li> <li>• Not Met: Involves stakeholders in evaluation effectiveness of actions</li> </ul>   |
| B.2.5          | Communicating on human rights impacts  | 0                | The individual elements of the assessment are met or not as follows:<br>Score 1<br><ul style="list-style-type: none"> <li>• Not Met: Provides two examples of comms with stakeholders</li> </ul> Score 2<br><ul style="list-style-type: none"> <li>• Not Met: Describes challenges to effective comms and how it is working to address them</li> </ul>   |

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

| Indicator Code | Indicator name                      | Score (out of 2) | Explanation   |
|----------------|-------------------------------------|------------------|---|
| C.1            | Grievance mechanism(s) for workers  | 1.5              | The individual elements of the assessment are met or not as follows:<br>Score 1<br><ul style="list-style-type: none"> <li>• Met: Grievance mechanism 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: <a href="https://corporate.target.com">corporate.target.com</a>]</li> </ul> Score 2<br><ul style="list-style-type: none"> <li>• Not Met: Grievance mechanism available in appropriate languages and workers made aware: Regarding the Integrity Hotline, the 2022 Environmental, Social and Governance Report indicates: 'the call is free and handled by an independent third party, and local language interpreters are available'. However, it is not clear how workers are made aware of it. [2022 Target Environmental, Social and Governance Report, 2022: <a href="https://corporate.target.com">corporate.target.com</a>]</li> <li>• Met: Describes how workers in supply chain access 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: <a href="https://corporate.target.com">corporate.target.com</a>]</li> <li>• Not Met: Expects suppliers to convey expectation to their 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. No further details found during last revision. [2021 Corporate Responsibility Report, N/A: <a href="https://corporate.target.com">corporate.target.com</a>]</li> </ul> |
| C.2            | Grievance mechanism(s) for external | 0                | The individual elements of the assessment are met or not as follows:<br>Score 1<br><ul style="list-style-type: none"> <li>• Not Met: Grievance mechanism accessible to all external individuals and communities: The Report Concerns webpage is openly available online: 'If you see</li> </ul>   |

| Indicator Code | Indicator name   | Score (out of 2) | Explanation  |
|----------------|--|------------------|--|
|                | individuals and communities  |                  | <p>or suspect any activity that violates our Code of Ethics, policies or laws, you have a responsibility to promptly report in good faith using one of the reporting options. You also have a responsibility to report any suspected violations shared with you by another team member'. However, it is not clear from the Company's disclosure whether external stakeholders can report concerns. [Reporting Concerns_web, N/A: <a href="https://secure.ethicspoint.com">secure.ethicspoint.com</a>]</p> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Grievance mechanism available in appropriate languages and affected stakeholders made aware: The Report Concerns webpage is available in 13 languages. Also, it is not clear that the other grievance mechanisms are also available for individuals and communities in local languages. The 2022 Environmental, Social and Governance Report adds: 'the call is free and handled by an independent third party, and local language interpreters are available'. However, it is not clear how affected external stakeholders at its own operations are aware of these services. [Reporting Concerns_web, N/A: <a href="https://secure.ethicspoint.com">secure.ethicspoint.com</a>] &amp; [2022 Target Environmental, Social and Governance Report, 2022: <a href="https://corporate.target.com">corporate.target.com</a>]</li> <li>• Not Met: Describes how external individuals/communities access grievance mechanism: Although the Company has a grievance channel open to its suppliers, it is not clear that external individuals and communities have access to it, in order to raise Complaints or concerns about human rights issues at the Company's suppliers. [Business Partner Code of Conduct, N/A: <a href="https://corporate.target.com">corporate.target.com</a>]</li> <li>• Not Met: Expects supplier to convey expectation to their suppliers</li> </ul> |
| C.3            | Users are involved in the design and performance of the mechanism(s)                   | 0                | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Describes how users engaged on design and performance</li> <li>• Not Met: Provides user engagement examples (at least two) on design and performance</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Describes how users engaged on improvement of mechanism: The Supply Chain Labor &amp; Human Rights Policies indicates: 'Target continues to explore opportunities to increase awareness and accessibility of reporting options and drive comfort in using the reporting options provided. During 2021, we distributed information on accessing and engaging with Target's Integrity Hotline to all factory and supplier locations'. However, it is not clear how it engages with potential or actual users (or individuals or organisations acting on their behalf) on the improvement of the mechanism. [Supply Chain Labor &amp; Human Rights Policies_web, N/A: <a href="https://corporate.target.com">corporate.target.com</a>]</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                | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Describes procedure and timescales for managing complaints or concerns: The Supply Chain Labor &amp; Human Rights Policies indicates: 'Once a grievance is raised, Target leverages a strict triage process to ensure issues are addressed and/or investigated by the appropriate, qualified team. Grievances are managed from intake to resolution. Additionally, we recognize our responsibility to exercise influence through our business relationships and building leverage with others to address issues deeper in our supply chain where we may not have direct business relationships. This specific analysis of human rights impacts is integrated into our existing routine for handling cases and incidents'. The Integrity Line FAQ adds: 'You will receive a report key after making a report online or through the hotline. You can use the report key to follow up on a report or add more information as needed for up to 30 days. If an investigator has a follow-up question for you, you will see it when you enter the report key and can answer the question while still protecting your identity'. However, no timescales for addressing the complaints or concerns. [Supply Chain Labor &amp; Human Rights Policies_web, N/A: <a href="https://corporate.target.com">corporate.target.com</a>] &amp; [Integrity Line FAQ, N/A: <a href="https://secure.ethicspoint.com">secure.ethicspoint.com</a>]</li> <li>• Not Met: Describes technical, financial, advisory support to enable equal access</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Describe types of outcome to complainant through use of mechanism</li> <li>• Not Met: Describes escalation to senior levels / independent adjudicators</li> </ul>                                   |
| C.5            | Prohibition of retaliation for raising complaints or concerns                          | 1                | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Public statement prohibiting retaliation against workers/stakeholders: 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'. [Integrity Line FAQ, N/A: <a href="https://secure.ethicspoint.com">secure.ethicspoint.com</a>]</li> </ul>   |

| Indicator Code | Indicator name   | Score (out of 2) | Explanation  |
|----------------|--|------------------|--|
|                |  |                  | <ul style="list-style-type: none"> <li>• Met: Describes practical measures to prevent retaliation: The 2022 CA Transparency in Supply Chains Act indicates: 'The purpose of the Integrity Hotline is to provide a vehicle for anonymously reporting concerns dealing with potentially unfair, unlawful or unethical business practices and to maintain a system through which Target can investigate claims and address complaints'. [2022 CA Transparency in Supply Chains Act, 2022: <a href="https://help.target.com">help.target.com</a>]</li> <li>Score 2</li> <li>• Not Met: Specifies no legal action, firing or violence</li> <li>• Not Met: Expects suppliers to prohibit retaliation against workers/stakeholders: The Business Partner Code of Conduct indicates: 'Retaliation of any kind against an individual who reports concerns in good faith violates Target's principles and will not be tolerated'. However, it is not clear this prohibition of retaliation also covers individual stakeholders and communities at supplier level, as it is not clear the mechanism is open to them. [Business Partner Code of Conduct, N/A: <a href="https://corporate.target.com">corporate.target.com</a>]</li> </ul>  |
| C.6            | Company involvement with state-based judicial and non-judicial grievance mechanisms            | 0                | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Complainants not asked to waive legal rights</li> <li>• Not Met: Does not require confidentiality provisions</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <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  | 1                | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Describes approach taken to remedy adverse HRs impacts: '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'. [CA Transparency in Supply Chains Act 2020, 2020: <a href="https://help.target.com">help.target.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <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: The Supply Chain Labor &amp; Human Rights Policies indicates: 'specific analysis of human rights impacts is integrated into our existing routine for handling cases and incidents. To prevent re-occurrence, we have ongoing monitoring programs in place to assess progress, incentivize suppliers that share our ambition for responsible and sustainable business practices through more business, and encourage engagement in various programs at local and global levels'. However, no further description found of the approach it would take to review and change systems, processes or practices to prevent similar adverse impacts in the future. [Supply Chain Labor &amp; Human Rights Policies_web, N/A: <a href="https://corporate.target.com">corporate.target.com</a>]</li> </ul> |
| C.8            | Communication on the effectiveness of grievance mechanism(s) and incorporating lessons learned | 0                | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Discloses number of grievances filed, addressed or resolved and outcomes achieved</li> <li>• Not Met: Example of how lessons from mechanism improved HRs management system</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Describes process to evaluate mechanism and changes made as a result</li> <li>• Not Met: Describes procedures to address delays of outcomes agreed with stakeholders</li> </ul>  |

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

### D.1 Food and Agricultural Products

| Indicator Code | Indicator name                                  | Score (out of 2) | Explanation  |
|----------------|---|------------------|--|
| D.1.1.b        | Living wage (in the supply chain)               | 0                | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Requirements on living wage in supplier codes and 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. No further details found during last revision. [Business Partner Code of Conduct, N/A: <a href="https://corporate.target.com">corporate.target.com</a>]</li> <li>• Not Met: Describes work with suppliers on living wage</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Assessment of scope of payment below living wage in supply chain</li> <li>• Not Met: Analysis of trends demonstrating progress</li> </ul>  |
| D.1.2          | Aligning purchasing decisions with human rights | 0.5              | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Describes practices to avoid price or short notice requirements that undermine HRs: 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. No further details found during last revision. [2021 Corporate Responsibility Report, N/A: <a href="https://corporate.target.com">corporate.target.com</a>]</li> <li>• Not Met: Describes practices to pay suppliers in line with agreed timeframes</li> <li>• Met: Reviews own operations to mitigate negative impact of purchasing practices: The 2022 Environmental, Social and Governance Report adds: 'Through our partnership with Better Buying, a nonprofit organization focused on improving purchasing practices throughout the global supply chain, we annually assess the impact of our purchasing practices on supplier sustainability through a financial, environmental and social lens. We leverage this assessment to better understand how our day-to-day purchasing practices are affecting our suppliers, their workers and the environment. In partnership with Better Buying, we rolled out a new educational training course to help commercial teams understand what purchasing practices are, why they are essential and how decisions can impact workers worldwide'. [2022 Target Environmental, Social and Governance Report, 2022: <a href="https://corporate.target.com">corporate.target.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Meets all requirements under score 1</li> <li>• Not Met: Example of assessing and changing of purchasing practices</li> </ul> |
| D.1.3          | Mapping and disclosing the supply chain         | 0                | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Identifies direct and indirect suppliers including manufacturing sites: The webpage section Supply Chain Traceability &amp; Transparency specifies: '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 fabric, trim, packaging, apparel textile mills and wet processing facilities. The increased transparency creates meaningful opportunities to enhance responsible and sustainable production practices. This list is subject to change and updates are made on a quarterly basis'. However, although it indicates that it identifies tier 2 apparel suppliers, it is not clear it does the same for its food supply chain. [Supply Chain Traceability &amp; Transparency_web, N/A: <a href="https://corporate.target.com">corporate.target.com</a>]</li> </ul>   |

| Indicator Code | Indicator name   | Score (out of 2) | Explanation   |
|----------------|--|------------------|---|
|                |  |                  | <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Discloses names and locations of significant parts of supply chain and how significance was defined: The Company discloses a list of factories [including food] in order to increase supply chain transparency: ‘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 fabric, trim, packaging, apparel textile mills and wet processing facilities. The increased transparency creates meaningful opportunities to enhance responsible and sustainable production practices. This list is subject to change and updates are made on a quarterly basis’. However, no evidence found that it also discloses the most significant of its agricultural supply chain, including indirect suppliers (the Company to indicate what the most significant parts of its supply chain are). [Supply Chain Traceability &amp; Transparency_web, N/A: <a href="https://corporate.target.com">corporate.target.com</a>] &amp; [Global Factory List 2023, 09/01/2023: <a href="https://corporate.target.com">corporate.target.com</a>]</li> <li>• Not Met: Discloses direct or indirect suppliers involved in higher-risk activities</li> </ul>   |
| D.1.4.b        | Prohibition of child labour: Age verification and corrective actions (in the supply chain) | 0                | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Requirements on child labour in supplier codes and 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 &amp; 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. In order to meet the requirement, provisions must part of a contractual arrangement with its suppliers or in the supplier code of conduct. No further details found during last revision. [Business Partner Code of Conduct, N/A: <a href="https://corporate.target.com">corporate.target.com</a>] &amp; [Supply Chain Labor &amp; Human Rights Policies_web, N/A: <a href="https://corporate.target.com">corporate.target.com</a>]</li> <li>• Not Met: Describes work with suppliers on eliminating child labour: The 2022 Environmental, Social and Governance Report indicates: ‘Target is a member of The Centre for Child Rights and Business (CRIB) Working Group, which is advancing industry efforts to eliminate underage labor. We are working with CRIB on child labor prevention and remediation; when underage workers are identified, we collectively assess and address the noncompliance’. However, no further description found of how it proactively works with suppliers to eliminate child labour and to improve working conditions for young workers where relevant. [2022 Target Environmental, Social and Governance Report, 2022: <a href="https://corporate.target.com">corporate.target.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Assessment of scope of child labour in supply chain</li> <li>• Not Met: Analysis of trends demonstrating progress</li> </ul> |
| D.1.5.b        | Prohibition of forced labour: Recruitment fees and costs (in the supply chain)             | 0.5              | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Requirements on debt/fees in supplier codes and 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 &amp; 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: <a href="https://corporate.target.com">corporate.target.com</a>] &amp; [Supply Chain Labor &amp; Human Rights Policies_web, N/A: <a href="https://corporate.target.com">corporate.target.com</a>]</li> </ul>  |

| Indicator Code | Indicator name  | Score (out of 2) | Explanation   |
|----------------|---|------------------|---|
|                |   |                  | <ul style="list-style-type: none"> <li>• Met: Describes work with suppliers on debt/fees for job seekers/workers: 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: <a href="https://corporate.target.com">corporate.target.com</a>] &amp; [CA Transparency in Supply Chains Act 2020, 2020: <a href="https://help.target.com">help.target.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Assessment scope of payment of recruitment fees in supply chain</li> <li>• Not Met: Analysis of trends demonstrating progress</li> </ul>  |
| D.1.5.d        | Prohibition of forced labour: Wage practices (in the supply chain)          | 0                | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Requirements on paying in full and on time in supplier codes and 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'. No evidence found, however, of suppliers being formally required to pay in full. [Business Partner Code of Conduct, N/A: <a href="https://corporate.target.com">corporate.target.com</a>] &amp; [Applying Target Standards of Vendor Engagement, 2023: <a href="https://corporate.target.com">corporate.target.com</a>]</li> <li>• Not Met: Describes work with suppliers on paying workers regularly, in full and on time</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <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.1.5.f        | Prohibition of forced labour: Restrictions on workers (in the supply chain) | 0.5              | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Requirements on free movement in supplier codes and contracts: The Business Partner Code of Conduct indicates: 'All workers have the right to engage in work willingly, without surrendering identification [...]. Workers have the right to freedom of movement and our suppliers must ensure it is afforded to them'. [Business Partner Code of Conduct, N/A: <a href="https://corporate.target.com">corporate.target.com</a>]</li> </ul>  |

| Indicator Code | Indicator name   | Score (out of 2) | Explanation   |
|----------------|--|------------------|---|
|                |  |                  | <ul style="list-style-type: none"> <li>• Not Met: Describes working with suppliers on free movement of workers: The 2020 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'. Similar evidence was found in the 2022 CA Transparency in Supply Chains Act. It is not clear, however, if these trainings apply to the agricultural supply chain. [CA Transparency in Supply Chains Act 2020, 2020: <a href="https://help.target.com">help.target.com</a>] &amp; [2022 CA Transparency in Supply Chains Act, 2022: <a href="https://help.target.com">help.target.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <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.1.6.b        | Freedom of association and collective bargaining (in the supply chain)                             | 0                | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Requirements on FoA/CB in suppliers codes and 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: <a href="https://corporate.target.com">corporate.target.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Describes work with suppliers on FoA/CB</li> <li>• Not Met: Assessment of scope of restriction of FoA/CB in supply chain</li> <li>• Not Met: Analysis of trends demonstrating progress</li> </ul>   |
| D.1.7.b        | Health and safety: Fatalities, lost days, injury, occupational disease rates (in the supply chain) | 0.5              | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Requirements on H&amp;S in supplier codes and contracts: The Business Partner Code of Conduct indicates: 'Suppliers must provide a safe and healthy working environment for workers. We expect hazards to be assessed and appropriate safeguards to be implemented, monitored, and trained to workers to prevent accidents, injuries, and illnesses. The safeguards must protect workers from exposure to toxic chemicals or materials, ensure life and building safety, and meet local laws. If suppliers provide residential facilities for their workers, they must be safe and sanitary'. [Business Partner Code of Conduct, N/A: <a href="https://corporate.target.com">corporate.target.com</a>]</li> <li>• Not Met: Discloses injury rate or lost days in supply chain in 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. No further details found during last revision. [2021 Corporate Responsibility Report, N/A: <a href="https://corporate.target.com">corporate.target.com</a>]</li> <li>• Not Met: Discloses fatalities for workers in supply chain in 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. No further details found during last revision. [2021 Corporate Responsibility Report, N/A: <a href="https://corporate.target.com">corporate.target.com</a>]</li> <li>• Not Met: Discloses occupational disease rate in supply chain in 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. No further details found during last revision. [2021 Corporate Responsibility Report, N/A: <a href="https://corporate.target.com">corporate.target.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Describes work with suppliers of H&amp;S: No evidence found of how it works with its supply chain to improve their practices in relation to health and safety. Previous assessment used evidence from the 2019 Corporate Social Responsibility Report, which CHRB no longer considers a suitable source for policy statements.</li> <li>• Not Met: Assessment of scope of H&amp;S issues in supply chain</li> <li>• Not Met: Analysis of trends demonstrating progress</li> </ul> |

| Indicator Code | Indicator name   | Score (out of 2) | Explanation  |
|----------------|--|------------------|--|
| D.1.8.b        | Land rights:<br>Land acquisition (in the supply chain) | 0                | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Requirements on land and tenure rights in supplier codes and contracts</li> <li>• Not Met: Describes work with suppliers on land issues</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Requirement for suppliers to provide compensation in resettlement</li> <li>• Not Met: Assessment of scope of land rights issues in supply chain</li> <li>• Not Met: Analysis of trends demonstrating progress</li> </ul>  |
| D.1.9.b        | Water and sanitation (in the supply chain)             | 0.5              | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Requirements on access to water and sanitation in supplier codes and contracts: The Company requires in its Business Partner Code of Conduct: 'Suppliers must have an environmental management system that identifies, characterizes, and inventories all operational and production impacts to air emission, energy, water, and wastewater. Impacts must be measured and tracked. [...] We will not tolerate suppliers with undersized, bypassed, or inoperable wastewater treatment systems. Suppliers must install and maintain appropriately-sized wastewater treatment systems to ensure pollutants are at or below legally required levels. [...] Suppliers are expected to set clear goals to improve energy and water efficiency and document progress made toward achieving those goals'. However, no reference found to access to water and sanitation requirements and 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: <a href="https://corporate.target.com">corporate.target.com</a>]</li> <li>• Met: Describes work with suppliers on access to water: 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'. The 2022 Environmental, Social and Governance Report adds: 'Ongoing programs with Ai are improving water efficiency in home and apparel textiles'. [2021 Corporate Responsibility Report, N/A: <a href="https://corporate.target.com">corporate.target.com</a>] &amp; [2022 Target Environmental, Social and Governance Report, 2022: <a href="https://corporate.target.com">corporate.target.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Assessment of scope of water and sanitation issues in supply chain</li> <li>• Not Met: Analysis of trends demonstrating progress</li> </ul>  |
| D.1.10.b       | Women's rights (in the supply chain)                   | 0                | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Requirements on women's rights in supplier codes and 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'. Also, 'We are working toward a future where everyone, regardless of [...] sex, [...] has equal access to opportunities and in which everyone feels welcome, valued and respected'. 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: <a href="https://corporate.target.com">corporate.target.com</a>]</li> <li>• Not Met: Describes work with suppliers on women's rights: The 2022 Environmental, Social and Governance Report indicates: 'we work with [...] CARE on women's empowerment programs. [...] Target continues to partner with CARE International, designing strategies to drive gender equity throughout our sourcing practices and extended supply chain'. However, no further description of the work done found. Moreover, 'In our supply chain communities, we partnered with CARE in Indonesia and Bangladesh to provide cash-for-work and cash voucher assistance to members of their women's Empowerment, Knowledge and Transformative Action (EKATA) groups. This initiative aims to mitigate the immediate socioeconomic impacts of the pandemic'. However, it is not clear how it proactively works with suppliers in order to improve working conditions for women workers in the supply chain. Previous assessment used evidence from the 2019 CSR Report, which dates more than three reporting years ago. [2022 Target Environmental, Social and Governance Report, 2022: <a href="https://corporate.target.com">corporate.target.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Assessment of scope of women's rights issues in supply chain</li> </ul> |

| Indicator Code | Indicator name | Score (out of 2) | Explanation  |
|----------------|----------------|------------------|--|
|                |                |                  | • Not Met: Analysis of trends demonstrating progress |

## D.2 Apparel

| Indicator Code | Indicator name                                  | Score (out of 2) | Explanation  |
|----------------|---|------------------|--|
| D.2.1.b        | Living wage (in the supply chain)               | 0                | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Requirements on living wage in supplier codes and 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. No further details found during last revision. [Business Partner Code of Conduct, N/A: <a href="https://corporate.target.com">corporate.target.com</a>]</li> <li>• Not Met: Describes work with suppliers on living wage</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Assessment of scope of payment below living wage in supply chain</li> <li>• Not Met: Analysis of trends demonstrating progress</li> </ul>  |
| D.2.2          | Aligning purchasing decisions with human rights | 0                | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Describes practices to avoid price or short notice requirements that undermine HRs: 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. No further details found during last revision.</li> <li>• Not Met: Describes practices to pay suppliers in line with agreed timeframes</li> <li>• Not Met: Reviews own operations to mitigate negative impact of purchasing practices: The 2022 Environmental, Social and Governance Report adds: 'Through our partnership with Better Buying, a nonprofit organization focused on improving purchasing practices throughout the global supply chain, we annually assess the impact of our purchasing practices on supplier sustainability through a financial, environmental and social lens. We leverage this assessment to better understand how our day-to-day purchasing practices are affecting our suppliers, their workers and the environment. In partnership with Better Buying, we rolled out a new educational training course to help commercial teams understand what purchasing practices are, why they are essential and how decisions can impact workers worldwide'. No evidence found, however, on whether these assessments have had implications for planning, merchandising and costing. [2022 Target Environmental, Social and Governance Report, 2022: <a href="https://corporate.target.com">corporate.target.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Meets all requirements under score 1</li> <li>• Not Met: Example of assessing and changing of purchasing practices</li> </ul> |
| D.2.3          | Mapping and disclosing the supply chain         | 1.5              | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Identifies direct and indirect suppliers including manufacturing sites: The webpage section Supply Chain Traceability &amp; Transparency specifies: '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 fabric, trim, packaging, apparel textile mills and wet processing facilities'. [Supply Chain Traceability &amp; Transparency_web, N/A: <a href="https://corporate.target.com">corporate.target.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Discloses names and locations of significant parts of supply chain and how significance was defined: The webpage section Supply Chain Traceability &amp; Transparency specifies: '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 fabric, trim, packaging, apparel textile mills and wet processing facilities'. The list includes factory name and specific location. [Supply Chain Traceability &amp; Transparency_web, N/A: <a href="https://corporate.target.com">corporate.target.com</a>] &amp; [Global Factory List 2023, 09/01/2023: <a href="https://corporate.target.com">corporate.target.com</a>]</li> <li>• Not Met: Discloses direct or indirect suppliers involved in higher-risk activities</li> </ul>   |

| Indicator Code | Indicator name  | Score (out of 2) | Explanation   |
|----------------|---|------------------|---|
| D.2.4.b        | Prohibition of child labour:<br>Age verification and corrective actions (in the supply chain) | 0                | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Requirements on child labour in supplier codes and 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 &amp; 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. In order to meet the requirement, provisions must part of a contractual arrangement with its suppliers or in the supplier code of conduct. No further details found during last revision. [Business Partner Code of Conduct, N/A: <a href="https://corporate.target.com">corporate.target.com</a>] &amp; [Supply Chain Labor &amp; Human Rights Policies_web, N/A: <a href="https://corporate.target.com">corporate.target.com</a>]</li> <li>• Not Met: Describes work with suppliers on eliminating child labour: The 2022 Environmental, Social and Governance Report indicates: 'Target is a member of The Centre for Child Rights and Business (CRIB) Working Group, which is advancing industry efforts to eliminate underage labor. We are working with CRIB on child labor prevention and remediation; when underage workers are identified, we collectively assess and address the noncompliance. We also provide long-term support to affected individuals to prevent a return to underage work. Since 2015, we have also worked with GoodWeave to combat underage labor in the Indian handwoven goods industry. GoodWeave-certified rugs are woven by adult artisans and help support education for thousands of at-risk children who might otherwise need to work. All owned brand rugs that are handwoven or tufted in India must be GoodWeave-certified'. However, no further description found of how it proactively works with suppliers to eliminate child labour and to improve working conditions for young workers where relevant. [2022 Target Environmental, Social and Governance Report, 2022: <a href="https://corporate.target.com">corporate.target.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Assessment of scope of child labour in supply chain</li> <li>• Not Met: Analysis of trends demonstrating progress</li> </ul> |
| D.2.5.b        | Prohibition of forced labour:<br>Recruitment fees and costs (in the supply chain)             | 1                | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Requirements on debt/fees in supplier codes and 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 &amp; 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: <a href="https://corporate.target.com">corporate.target.com</a>] &amp; [Supply Chain Labor &amp; Human Rights Policies_web, N/A: <a href="https://corporate.target.com">corporate.target.com</a>]</li> </ul>  |

| Indicator Code | Indicator name  | Score (out of 2) | Explanation   |
|----------------|---|------------------|---|
|                |   |                  | <ul style="list-style-type: none"> <li>• Met: Describes work with suppliers on debt/fees for job seekers/workers: 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: <a href="https://corporate.target.com">corporate.target.com</a>] &amp; [CA Transparency in Supply Chains Act 2020, 2020: <a href="https://help.target.com">help.target.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Assessment scope of payment of recruitment fees in supply chain</li> <li>• Not Met: Analysis of trends demonstrating progress</li> </ul>  |
| D.2.5.d        | Prohibition of forced labour: Wage practices (in the supply chain)          | 0.5              | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Requirements on paying in full and on time in supplier codes and 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'. 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: <a href="https://corporate.target.com">corporate.target.com</a>] &amp; [Standards of Vendor Engagement, N/A: <a href="https://corporate.target.com">corporate.target.com</a>]</li> </ul> <ul style="list-style-type: none"> <li>• Not Met: Describes work with suppliers on paying workers regularly, in full and on time</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <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.f        | Prohibition of forced labour: Restrictions on workers (in the supply chain) | 0.5              | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Requirements on free movement in supplier codes and contracts: The Business Partner Code of Conduct indicates: 'All workers have the right to engage in work willingly, without surrendering identification [...]. Workers have the right to freedom of movement and our suppliers must ensure it is afforded to them'. [Business Partner Code of Conduct, N/A: <a href="https://corporate.target.com">corporate.target.com</a>]</li> </ul>  |

| Indicator Code | Indicator name   | Score (out of 2) | Explanation  |
|----------------|--|------------------|--|
|                |  |                  | <ul style="list-style-type: none"> <li>• Not Met: Describes working with suppliers on free movement of workers: The 2020 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'. Similar evidence was found in the 2022 CA Transparency in Supply Chains Act. [CA Transparency in Supply Chains Act 2020, 2020: <a href="https://help.target.com">help.target.com</a>] &amp; [2022 CA Transparency in Supply Chains Act, 2022: <a href="https://help.target.com">help.target.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <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.b        | Freedom of association and collective bargaining (in the supply chain)                             | 0                | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Requirements on FoA/CB in suppliers codes and 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: <a href="https://corporate.target.com">corporate.target.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Describes work with suppliers on FoA/CB</li> <li>• Not Met: Assessment of scope of restriction of FoA/CB in supply chain</li> <li>• Not Met: Analysis of trends demonstrating progress</li> </ul>  |
| D.2.7.b        | Health and safety: Fatalities, lost days, injury, occupational disease rates (in the supply chain) | 0.5              | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Requirements on H&amp;S in supplier codes and contracts: The Business Partner Code of Conduct indicates: 'Suppliers must provide a safe and healthy working environment for workers. We expect hazards to be assessed and appropriate safeguards to be implemented, monitored, and trained to workers to prevent accidents, injuries, and illnesses. The safeguards must protect workers from exposure to toxic chemicals or materials, ensure life and building safety, and meet local laws. If suppliers provide residential facilities for their workers, they must be safe and sanitary'. [Business Partner Code of Conduct, N/A: <a href="https://corporate.target.com">corporate.target.com</a>]</li> <li>• Not Met: Discloses injury rate or lost days in supply chain in 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. No further details found during last revision. [2021 Corporate Responsibility Report, N/A: <a href="https://corporate.target.com">corporate.target.com</a>]</li> <li>• Not Met: Discloses fatalities for workers in supply chain in 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. No further details found during last revision. [2021 Corporate Responsibility Report, N/A: <a href="https://corporate.target.com">corporate.target.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Discloses occupational disease rate in supply chain in 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. No further details found during last revision. [2021 Corporate Responsibility Report, N/A: <a href="https://corporate.target.com">corporate.target.com</a>]</li> <li>• Met: Describes work with suppliers of H&amp;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: <a href="https://corporate.target.com">corporate.target.com</a>]</li> <li>• Not Met: Assessment of scope of H&amp;S issues in supply chain</li> <li>• Not Met: Analysis of trends demonstrating progress</li> </ul> |

| Indicator Code | Indicator name                       | Score (out of 2) | Explanation  |
|----------------|--------------------------------------|------------------|--|
| D.2.8.b        | Women's rights (in the supply chain) | 0                | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Requirements on women's rights in contracts/codes with suppliers: 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'. Also, 'We are working toward a future where everyone, regardless of [...] sex, [...] has equal access to opportunities and in which everyone feels welcome, valued and respected'. 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: <a href="https://corporate.target.com">corporate.target.com</a>]</li> <li>• Not Met: Describes work with suppliers on women's rights: The 2022 Environmental, Social and Governance Report indicates: 'We and CARE are partnering to empower garment workers in Bangladesh, Indonesia and Vietnam. CARE's Dignified Work initiative aims to build confidence, trust, assertiveness and leadership skills for female garment workers'. Moreover, 'Target supports BSR's HERproject to empower female supply chain workers through workplace-based health, financial inclusion and gender equality interventions'. However, no details found on the actual work conducted in which the Company is involved. Previous evidence was based on a source that has more than three reporting years. [2022 Target Environmental, Social and Governance Report, 2022: <a href="https://corporate.target.com">corporate.target.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Assessment of scope of unsafe working conditions/discrimination against women in supply chain</li> <li>• Not Met: Analysis of trends demonstrating progress</li> </ul> |
| D.2.9.b        | Working hours (in the supply chain)  | 0.5              | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Requirements on working hours in codes/contracts with suppliers: 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 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. Workers must have at least 1 full non-working day in every 7-day period'. [Business Partner Code of Conduct, N/A: <a href="https://corporate.target.com">corporate.target.com</a>]</li> <li>• Not Met: Describes work with suppliers on working hours</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Assessment of scope of excessive working hours in supply chain</li> <li>• Not Met: Analysis of trends demonstrating progress</li> </ul>  |

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

| Indicator Code | Indicator name  | Score (out of 2) | Explanation   |
|----------------|---|------------------|---|
| E(1).0         | Serious allegation No 1   |                  | <ul style="list-style-type: none"> <li>• Area: Forced Labour</li> <li>• Headline: Target among other accused of workers' abuse in its Mexican supply chain</li> <li>• Story: On December 31, 2021, Los Angeles Times reported that Walmart, Albertsons, Target and Kroger have been accused of workers abuse after the Companies' suppliers -Agropecuarios Tom and Horticola Tom - were accused of forced labour in Mexico.</li> </ul> <p>The two targeted agribusinesses have allegedly withheld wages and subjected workers to abusive working and living conditions, among other violations, according to U.S. Customs and Border Protection (CBP).</p> <p>The Biden administration is blocking all tomato shipments from the agribusinesses based in the Mexican state of San Luis Potosi, under a "withhold release order" handed down in late October 2021 by U.S. Customs and Border Protection against Agropecuarios, Horticola, and their subsidiaries based on information that indicated the use of forced labour against its workers.</p> <p>The CBP has identified at least five of the International Labor Organization's (ILO) indicators of forced labor during its investigation, including abuse of vulnerability, deception, withholding of wages, debt bondage, and abusive working and living conditions.</p> <p>According to press sources, Del Campo Supreme, an Arizona distributor, received the vast majority of the produce. The other customer, was Mastronardi Produce, North America's largest distributor of greenhouse tomatoes.</p> <p>Mastronardi allegedly supplies most major U.S. retailers - including Walmart; Target; Kroger, which includes Ralphs and Food 4 Less; and Albertsons, the parent company of Safeway and Vons.</p> <p>The supply chain of Del Campo Supreme in the last year included Walmart and Albertsons.<br/> [Los Angeles Times, 31/12/2021, "U.S. blocking tomato shipments from Mexican farms accused of abusing workers": <a href="https://www.latimes.com">latimes.com</a>] [U.S. Customs and Border Protection Release, 21/10/2021, "CBP Issues Withhold Release Order on Tomatoes Produced by Farm in Mexico": <a href="https://www.cbp.gov">cbp.gov</a>]</p> |
| E(1).1         | The company has responded publicly to the allegation  | 0                | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Public response</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Detailed response</li> </ul>   |
| E(1).2         | The company has investigated and taken appropriate action                                     | 0                | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Engaged with stakeholders</li> <li>• Not Met: Identified cause</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Identified and implemented improvements: The Company discloses that supply chain workers and forced labour are among its salient human rights issues. It discloses some actions taken to address forced labour, including in relation to specific forced labour issues. However, none of the actions are related to implementing improvements in relation to sourcing tomatoes from Mexico. [CA Transparency in Supply Chains Act 2020, 2020: <a href="https://help.target.com">help.target.com</a>]</li> <li>• Not Met: Stakeholder input to steps taken</li> </ul>  |
| E(1).3         | The company has engaged with affected stakeholders to provide for or cooperate in remedy(ies) | 0                | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Provided remedy</li> <li>• Not Met: Evidence for lack of Impact or link</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Remedy satisfactory to stakeholders</li> <li>• Not Met: Remedy delivered</li> <li>• Not Met: Independent remedy process used</li> </ul>  |
| E(2).0         | Serious allegation No 2   |                  | <ul style="list-style-type: none"> <li>• Area: Health &amp; Safety</li> </ul>   |

| Indicator Code | Indicator name  | Score (out of 2) | Explanation   |
|----------------|---|------------------|---|
|                |   |                  | <ul style="list-style-type: none"> <li>• <b>Headline:</b> Nandan Denim criticized for multiple safety violations following fatal fire at Ahmedabad factory in India</li> <li>• <b>Story:</b> A fire at the Nandan Denim garments factory in Ahmedabad, Gujarat, India, in February 2020, reportedly killed at least seven people. According to fire officials, the factory had just one door, accessible only by climbing up a steep ladder, leaving workers virtually no means of escape. Police investigators have arrested the owner and some employees, after finding the factory in violation of several regulations. Surviving workers have said they work nearly 14 hours a day at a pace that forces them to forego meal or toilet breaks. Nandan Denim on its website has claimed to have commercial ties with US retailers such as Ann Taylor, Target, Mango, and Wrangler, though many have denied being customers. Loblaw Companies said one of their approved suppliers may have sourced large volumes of denim from Nandan Denim, while Inditex admitted Nandan Denim has supplied 10,000 pairs of jeans for one of its brands. Nandan Denim's sister company, Nandan Terry, is a supplier to Walmart and H&amp;M. The Textile Labour Association has said all textile factories in Ahmedabad have poor working conditions. [Los Angeles Times, 11/02/2020, "Workers clawed at ladder to door that was only escape from deadly India factory fire": <a href="https://www.latimes.com">latimes.com</a>] [Clean Clothes Campaign, 17/02/2020, "Deadly Indian factory fire again shows need for preventive safety measures and justice for workers": <a href="https://www.cleanclothes.org">cleanclothes.org</a>]</li> </ul> |
| E(2).1         | The Company has responded publicly to the allegation  | 1                | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• <b>Met:</b> Public response: Target replied to the allegations by stating it is not a customer of Nandan Denim and does not have a relationship with this company. It further stated that it is working to get its name removed from the company's website and annual reports. [Los Angeles Times, 11/02/2020: <a href="https://www.latimes.com">latimes.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• <b>Not Met:</b> Detailed response: The Company did not address the content of the allegation in detail.</li> </ul>   |
| E(2).2         | The company has investigated and taken appropriate action                                     | 0                | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• <b>Not Met:</b> Engaged with stakeholders</li> <li>• <b>Not Met:</b> Identified cause</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• <b>Not Met:</b> Identified and implemented improvements</li> <li>• <b>Not Met:</b> Stakeholder input to steps taken</li> </ul>   |
| E(2).3         | The company has engaged with affected stakeholders to provide for or cooperate in remedy(ies) | 0                | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• <b>Not Met:</b> Provided remedy</li> <li>• <b>Not Met:</b> Evidence for lack of Impact or link: The Company claims that it is not a customer of Nandan Denim. The Indian supplier is not included in the Company's publicly available mapping of tier 1 and tier 2 suppliers. However, no evidence was found on whether its tier 2 suppliers may have purchased from the factory. [Supply Chain Traceability &amp; Transparency_web, N/A: <a href="https://corporate.target.com">corporate.target.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• <b>Not Met:</b> Remedy satisfactory to stakeholders</li> <li>• <b>Not Met:</b> Remedy delivered</li> <li>• <b>Not Met:</b> Independent remedy process used</li> </ul>   |

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