MODERN SLAVERY AND HUMAN TRAFFICKING


About Our Business. TJX is an off-price retailer of apparel and home fashions with over 4,300 stores across three continents in nine countries offering a rapidly changing assortment of merchandise. We source merchandise from more than 21,000 vendors and over 100 countries. Our strategies to acquire merchandise are intentionally flexible to allow our buying organization to react to frequently changing opportunities and trends in the market and to adjust how and what is acquired as well as when it is acquired.

Our Commitment. At TJX, we are committed to treating people with dignity, fairness, and respect. Both our TJX Global Code of Conduct, which applies to all of our employees (Associates) worldwide, and our Vendor Code of Conduct, which applies to our merchandise vendors, reflect these principles and prohibit involuntary or forced labor. As described below, our factory audit program and training efforts further underscore this commitment.

Our TJX Social Compliance Committee, which includes senior leadership from the U.S., Canada, and Europe, meets on a regular basis to oversee TJX's ethical sourcing initiative. In addition to our Social Compliance Committee, in 2018, we established a Global Corporate Responsibility Executive Steering Committee comprised of senior personnel across several departments, which has responsibility for overseeing our global corporate responsibility efforts across functions and geographies, facilitating information exchange, recommending additional program efforts to potentially undertake as a Company, and reporting to the Company's senior management and Board of Directors as appropriate.

While an overview of our efforts is provided here in response to the California Transparency in Supply Chains Act and the U.K. Modern Slavery Act, we invite you to explore a more comprehensive description of our Social Compliance Program within this section of our Corporate Responsibility microsite.

Vendor Code of Conduct. As a condition of conducting business with TJX and as a means of self-certification, our merchandise vendors are required to agree to comply with our Vendor Code of Conduct, which prohibits involuntary or forced labor, including labor obtained through slavery or human trafficking. Our Vendor Code of Conduct further requires that the goods our merchandise vendors sell to us have been manufactured in accordance with all applicable laws and regulations, which include those pertaining to involuntary labor, forced labor or human trafficking. It also requires that merchandise vendors ensure that
all subcontractors and any other third parties they use in the production or distribution of goods offered for sale in our stores comply with the principles described in the Vendor Code of Conduct.

**TJX Global Code of Conduct.** Our TJX Global Code of Conduct prohibits behavior that creates an intimidating or hostile work environment, and it requires TJX Associates to obey all applicable laws and regulations of the countries in which we operate, including wage and hour rules. In choosing third parties to work with, our Associates are expected to select those that act with integrity and in a manner consistent with the ethical principles stated in our Code. TJX reviews any reported concerns and takes appropriate action depending on the nature and severity of the violation.

**Third-Party Audits.** We contract with both leading independent auditors (including UL, Intertek, and Omega) and other third parties (such as our buying agent) to conduct social compliance audits at factories that supply products that we have designed for sale in our stores and online. These social compliance audits evaluate and address risks of forced labor, including slavery and human trafficking. Over the last two decades, thousands of audits have been conducted.

We created a Global Social Compliance Manual, which is available in seven languages and contains an audit procedure outline and factory evaluation checklist to help the affected factories better understand our Vendor Code of Conduct and prepare for the audit process. The audits are conducted on an unannounced basis during specified time windows, and they are intended to verify the factories' compliance with the standards contained in our Vendor Code of Conduct, including our prohibition of involuntary or forced labor. To this end, factory audits consider whether workers are responsible for any fees associated with their recruitment, and evaluate policies related to passport retention. Vendors are expected to cooperate fully with the audits and to provide the auditors with full access to their facilities, employees, and documentation. Factory audits include employee interviews in order to hear first-hand about worker treatment. The factory’s score on the initial audit determines how soon it will be re-assessed, according to a risk-based audit cycle we have developed. We will take appropriate steps should we learn that a vendor is failing to meet our standards, including remediation, cancellation of purchase orders, or termination of our business relationship.

**Training.** We provide biennial training for Associates, including management, involved in the development and buying of merchandise, as well as cyclical in-person training for our buying agents, certain vendors and their factory representatives around the world. Among other things, this training provides guidance on recognizing and mitigating the risks of forced labor, modern slavery, and human trafficking. A senior member of our U.S.-based Global Social Compliance team travels globally to attend these training sessions in person, making sure our commitment to these important issues is clear.
Grievance Mechanisms. TJX Associates are encouraged to raise any concerns without fear of retaliation and have multiple channels to do so, including an ethics hotline staffed by independent third-party operators. External stakeholders, including vendor personnel, may reach us via any of the phone numbers or addresses listed by locality on the “Contact Us” section of our corporate website.

This Statement relates to our fiscal year that commenced on February 4, 2018 and ended February 2, 2019. It encompasses The TJX Companies, Inc. and its consolidated subsidiaries because we take a global approach to modern slavery compliance. However, not all of our consolidated subsidiaries are subject to the California Transparency in Supply Chains Act or the U.K. Modern Slavery Act. This Statement was approved on July 31, 2019 by the Board of Directors of TJX UK, which is the TJX subsidiary subject to the U.K. Modern Slavery Act, and signed by the undersigned Director of TJX UK on July 31, 2019.

David L. Averill, Director
TJX UK