



RESPONSES TO EVOLVING ISSUES

INCLUDING BANGLADESH, UZBEKISTAN, MODERN SLAVERY AND CALIFORNIA'S SB 657, CONFLICT MINERALS, AND FUR

Since 1999, we, our buying agents, and our third-party auditors have conducted thousands of audits of factories producing goods for TJX. Based on the knowledge learned from these audits and the program in general, we continue to revise and enhance our program.

BANGLADESH ▼

UZBEKISTAN ▼

MODERN SLAVERY AND HUMAN TRAFFICKING ▲

(California Transparency in Supply Chains Act of 2010 and U.K. Modern Slavery Act of 2015)

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 all of our merchandise suppliers, 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. While an overview of our efforts is provided here in response to the California Transparency in Supply Chains Act of 2010 and the U.K. Modern Slavery Act of 2015, 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** (</responsibility/responsible-business/social-compliance/vendor-code-of-conduct>), which prohibits the use of any form of involuntary or forced labor, including labor obtained through slavery or human trafficking. Our Vendor Code of Conduct further requires that the goods our vendors sell to us have been manufactured in accordance with all applicable laws and regulations.

TJX Global Code of Conduct. Our **TJX Global Code of Conduct** (</docs/default-source/default-document-library/TJX-Code-of-Conduct.pdf>) 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 must 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 independent auditors (including UL, Intertek, and Omega) and other third parties (such as our buying agents) to conduct social compliance audits at factories for suppliers of products that we have designed for sale in our stores and online, and to evaluate and address risks of forced labor, including slavery and human trafficking. Thousands of audits have been conducted since 1999.

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, auditors 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.

Our auditors 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 managers 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 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 ended February 3, 2018. It is made on behalf of The TJX Companies, Inc. and its consolidated subsidiaries (collectively, "TJX") because we take a global approach to the topic discussed herein. 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 has been approved by the Boards of the TJX subsidiaries subject to the U.K. Modern Slavery Act, as required by that Act, and signed by the undersigned Director of those entities.*



David L. Averill, Director

[Click here to view our 2017 statement](#)

[./docs/default-source/default-document-library/2017-Modern-Slavery-and-Human-Trafficking-Statement.pdf](https://docs.default-source/default-document-library/2017-Modern-Slavery-and-Human-Trafficking-Statement.pdf)

CONFLICT MINERALS POLICY ▼