

CORPORATE
RESPONSIBILITY
REPORT

The TJX Companies, Inc.

2015



V A L U E



Since The TJX Companies' inception, delivering value to our customers has been our mission, valuing our Associates has been at our core, returning value to our shareholders has been a constant priority, and adding value to our communities has been a central pursuit. Above all else, a key corporate value has always been acting with integrity, which guides everything we do.

As our Company grows, we continue to keep our core values of integrity and openness as an integral part of our expanding world.

Our global, TJX VALUE corporate responsibility program captures the essence of our Company and is aimed at helping us continue to make a positive, sustainable impact within the areas which we believe are key to our business and serve the interests of our Associates, customers, shareholders, vendors and communities.

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The five tenets of our program represent pursuits that have been important since the Company's inception. Those areas are:

VENDOR SOCIAL COMPLIANCE

ATTENTION TO GOVERNANCE

LEVERAGING OUR CULTURE

UNITED WITH OUR COMMUNITIES

ENVIRONMENTAL SUSTAINABILITY

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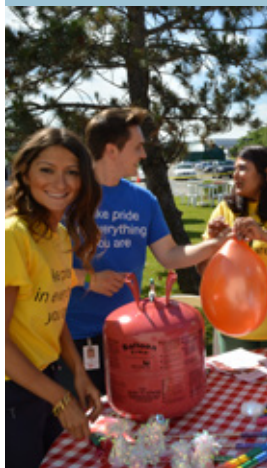
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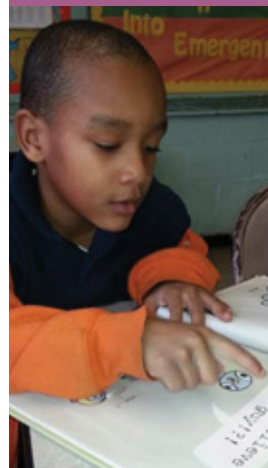
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ENVIRONMENTAL SUSTAINABILITY



To our Associates, Customers, Shareholders, Vendors and Neighbors:

**A LETTER
FROM
CAROL
MEYROWITZ,
OUR CHAIRMAN
AND CHIEF
EXECUTIVE
OFFICER**



Five years ago, we published our first TJX global Corporate Responsibility report and in doing so, extended what we believe is an important, ongoing conversation with all of you about how we conduct business using ethical business practices. While our brick-and-mortar stores and our e-commerce websites are focused on bringing value to our customers every day, we also deeply respect our obligation to continue to bring VALUE to the world in which we conduct our business. We are pleased to share the progress we make each year through our TJX VALUE Corporate Responsibility website and eBook, which feature program improvements in the U.S., Canada and Europe, across five important areas. As we deepen our understanding of what it means to be a good corporate citizen, we have, and will continue to, explore the best and most effective way to educate our stakeholders on our corporate responsibility efforts.

With this in mind, I am pleased to share with you our 2015 Corporate Responsibility eBook. Our eBook is a printable version of our website, which provides a detailed look at the progress TJX has made throughout 2014 and communicates our vision for the future. This includes measurable goals in some areas, including our recently established 10-year commitment to reduce energy usage and greenhouse gas emissions and our ongoing commitment to hire military Veterans. We hope you'll find our eBook engaging as we share vibrant content and stories that demonstrate the significant efforts and combined impact of our approximately 198,000 Associates working together across the globe.

I am particularly proud to share a few highlights from our reporting that demonstrate how deeply we care and how firmly we commit to the many causes we support. In 2014, our T.J. Maxx Associates celebrated 30 years of working with Save the Children in the U.S. and our T.K. Maxx and HomeSense Associates in the U.K. celebrated their 10-year partnership with Cancer Research U.K. In Canada, our Winners and HomeSense Associates have supported the Sunshine Foundation for over a decade, helping to grant wishes for children with severe physical disabilities or life-threatening illnesses. Thanks to the sustained efforts of our Associates and the generosity of our customers supporting many causes with us over many years, we have helped to make a meaningful impact on the lives of thousands of children.

As a global, value retailer for today and tomorrow, we hold ourselves to high standards at TJX. We remain committed to evolving our corporate responsibility program so that we may continue to improve our performance and make a positive, sustainable impact on the world, while maintaining our commitment to integrity, which has informed everything we do at TJX since day one. I invite you to explore this eBook and learn more about our corporate responsibility efforts.

Sincerely,

A handwritten signature in black ink that reads "Carol Meyrowitz".

Carol Meyrowitz
CHAIRMAN AND
CHIEF EXECUTIVE OFFICER
THE TJX COMPANIES, INC.



Our Company

The TJX Companies, Inc. is the leading off-price retailer of apparel and home fashions in the U.S. and worldwide, ranking No. 103 in the 2015 Fortune 500 listings, with \$29.1 billion in revenues in 2014, more than 3,300 stores in 7 countries, 3 e-commerce sites, and approximately 198,000 Associates. We operate T.J. Maxx and Marshalls (combined Marmaxx), HomeGoods and Sierra Trading Post, as well as tjmaxx.com and sierratradingpost.com, in the United States; Winners, HomeSense and Marshalls (combined TJX Canada) in Canada; and T.K. Maxx in the United Kingdom, Ireland, Germany, Poland and Austria, as well as HomeSense and tkmaxx.com in the U.K. (combined TJX Europe).*

We see ourselves as a global, value retailer and our off-price mission is to deliver great value to customers through the combination of brand, fashion, price and quality. We offer a rapidly changing assortment of brand name and designer merchandise at prices generally 20%-60% below department and specialty store regular prices on comparable merchandise, every day. With our value proposition and exciting treasure-hunt shopping experience, we believe that our demographic reach is among the widest in retail as we attract a broad range of fashion and value conscious customers across many income levels and demographic groups.

In our 38-year history, we have delivered steady sales and earnings growth and some of the highest returns on investment in retail. We have seen only one year with an annual comparable store sales decline. We believe that we operate one of the most flexible business models in the world and that year after year, our great flexibility has enabled us to succeed through various economic and business environments. Our stores have no walls between departments, which enables us to expand and contract merchandise categories to respond to market trends and customers' changing tastes. Our inventories turn rapidly, which allows us to buy close to need, with visibility into current fashion and pricing trends. We source merchandise globally from a vendor universe of over 17,000 vendors in more than 100 countries. We see ourselves as leaders in innovation, constantly testing new ideas, seeking the right categories, current fashions and top brands, and leveraging information from our worldwide buying presence. Further, our financial strength gives us the strong foundation and flexibility to grow our business and simultaneously return value to shareholders. These are some of the key factors that give us great confidence in our continued ability to increase sales and profitability as we continue to grow globally.

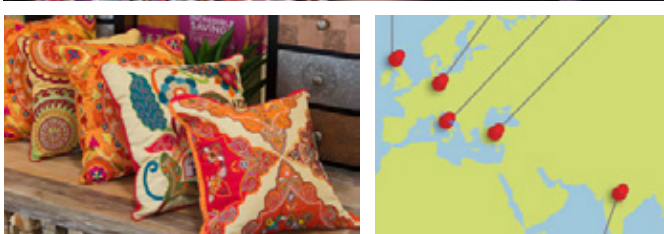
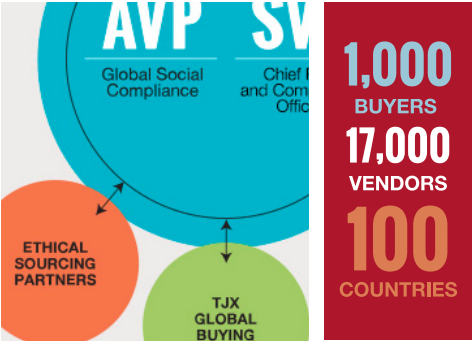
*Please note that references to things accomplished or completed by TJX in 2014 within this eBook denote TJX's fiscal year 2015, which began February 2, 2014 and ended January 31, 2015.



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At TJX, we have a long history of treating people with dignity, fairness and respect, and we are committed to operating our business with high standards of ethics. We believe our commitment to these principles is an important part of our success – in the past and as we continue to grow our Company.

Our commitment to fairness and ethics extends to our vendors and is embedded within our responsible sourcing initiatives through our vendor social compliance program. We strongly value the relationships that we have developed with our vendors. These relationships have been built on a foundation of honesty and trust and a commitment to ethical business practices. It is, therefore, critical that our vendors respect the laws and the cultures of the communities in which they operate and respect the rights of the workers who manufacture products for sale in our stores. In short, we expect our vendors to uphold the high ethical standards embodied in our Vendor Code of Conduct and vendor social compliance program.



Program Highlights

Supplier Engagement and Education

Since 2005, we have conducted over 100 training sessions for buying agents, vendors and factory management in 10 countries to educate them on our Vendor Code of Conduct and our expectations with respect to our vendor social compliance program, particularly local labor laws and ethical business practices. TJX Associates involved in the development and buying of our merchandise are also trained on our vendor social compliance program on a biennial basis.

Global Program Coordination

Each TJX international buying office has an appointed liaison that assists the Assistant Vice President (AVP), Global Social Compliance, with the communication of our vendor social compliance program requirements to local vendors. Others involved in the day-to-day management of product sourcing are also involved in our vendor social compliance program.

Leveraging Best-In-Class Expertise

We have retained UL LLC (UL) and Intertek Group PLC (Intertek), organizations that have extensive experience and knowledge in the field of ethical sourcing, to assist us with program development, education and training, and compliance monitoring. Our process includes the involvement of TJX internal buying staff and others involved in the day-to-day management of sourcing issues for TJX.



Strong Vendor Relationships

We strongly value the relationships that we have developed with our vendors – relationships that we believe have been a key factor in our long-term success. These relationships have been built on a foundation of honesty and trust and a commitment to ethical business practices.



On a worldwide basis, over 1,000 Associates in our buying organization source from a universe of more than 17,000 vendors in over 100 countries and, as part of TJX's purchase order terms, our vendors are required to comply with our Vendor Code of Conduct. The Code of Conduct requires that goods we sell have been manufactured and shipped in accordance with all applicable laws, regulations and industry standards, including among other things, a commitment to respect the rights of the workers who manufacture products for sale in our stores. These requirements stand even if a vendor applies their own code of conduct, monitoring and ethical sourcing guidelines.

1,000
BUYERS
17,000
VENDORS
100
COUNTRIES



Our Off-Price Business Model

We are an off-price retailer, and for us, value is a combination of brand, fashion, price and quality. We deliver great value on an ever changing selection of brand name and designer fashion at prices that are generally 20%-60% below department and specialty store regular prices on comparable merchandise, every day.



The majority of product we sell in our stores is brand name merchandise. To attain our merchandise, we work closely with our vendors and take advantage of a wide variety of opportunities, which can include department store cancellations, a manufacturer making up too much product, or a closeout deal when a vendor wants to clear merchandise at the end of a season. Additionally,

there are other ways we bring tremendous value to our customers. For example, some merchandise is designed by our own fashion and style experts and manufactured just for us, particularly when what we are seeing in the marketplace isn't the right value for our customers.

Our Vendor Social Compliance Efforts

Historically, we have focused our factory monitoring and supplier training program on suppliers of products that we have designed, as this is where we are most likely to be able to have a meaningful impact. We collaborate closely with our buying agents because they have strong relationships with local production facilities and are well positioned to reinforce our expectations on social compliance issues. TJX believes deeply in ethical sourcing in our supply chain and is committed to continuous improvement. Even though we do not own, operate or control any facilities that manufacture products sold in our stores, all of our vendors are required to follow our Vendor Code of Conduct.



Vendor Code of Conduct

In order for our vendors to understand our standards and expectations, TJX has an established Vendor Code of Conduct, which requires each of our vendors, at a minimum, to act in accordance with all applicable laws and regulations when manufacturing products to be sold to TJX. With respect to certain issues, our Code prescribes higher standards of performance.



High Standards

The Code reflects our own high standards, which embrace internationally recognized principles designed to protect the interests of the workers who manufacture products for sale in our stores. The principles encompassed in the Code set forth our expectations with respect to legal and regulatory compliance, health and safety, child labor, forced labor, wages and benefits, working hours, harassment, discrimination, freedom of association, environment, subcontractors, and monitoring and compliance. These principles have been informed by, and in many instances incorporate, human rights, labor rights and anti-corruption standards enunciated by the United Nations and other respected international bodies.

Vendor Code of Conduct

TJX requires that all products offered for sale in our stores be produced in facilities that meet specific criteria, as set forth below:

Compliance with Applicable Laws and Regulations

Our vendors and the factories in which the merchandise they sell us is manufactured (collectively, our “vendors”) must comply with all applicable laws and regulations, including, but not limited to, all environmental laws and regulations, and all laws, regulations and internationally adopted restrictions concerning bribery and corruption.



Health and Safety

Our vendors must provide their workers with a safe and healthy workplace and safe working conditions.

Child Labor

Our vendors must not use child labor. The term “child” is defined as anyone younger than 15 years of age (or younger than 14 years of age where the law of the country of manufacture allows 14-year-olds to work). However, in countries where the legal age for completing compulsory education is higher than 15, then we define “child” as anyone younger than the age for completing compulsory education.

Forced Labor

Our vendors must not use involuntary or forced labor, whether in the form of prison labor, indentured labor, bonded labor, labor acquired through slavery or human trafficking, or otherwise.



Wages and Benefits

Our vendors must abide with all applicable laws relating to wages and benefits, and must pay the legally prescribed minimum wage or the prevailing industry wage, whichever is higher.

Working Hours

Our vendors must not require their employees, on a regularly scheduled basis, to work in excess of 60 hours per week (or fewer hours if prescribed by applicable laws and regulations). All overtime must be

voluntary and must be fully compensated in accordance with the requirements of local law, and except in extraordinary circumstances, employees must be entitled to at least one day of rest in every seven-day period.

Harassment or Abuse

Our vendors must respect the rights and dignity of their employees. We will not tolerate human rights abuses, including physical, sexual, psychological or verbal harassment or abuse of workers.

Discrimination

Workers must be employed, retained and compensated based on their ability to perform their jobs, and must not be discriminated against on the basis of gender, race, color, national origin, age, religious, ethnic or cultural beliefs, or any other prohibited basis.

Freedom of Association

Our vendors must respect the rights of their workers to choose (or choose not) to freely associate and to bargain collectively where such rights are recognized by law.



Environment

Our vendors must be in compliance with all applicable environmental laws and regulations. Our vendors are strongly encouraged to protect the environment by: operating in a sustainable manner, where possible; conserving and protecting resources, such as water and energy; and taking into consideration environmental issues that may impact local communities.

Subcontractors

Our vendors must 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 this Code of Conduct. Additionally, our private label vendors must disclose to TJX's third-party auditors the names of all such subcontractors and third parties before social compliance audits are scheduled.

Monitoring and Compliance

TJX or its designated third-party auditor or agent shall have the right to monitor and assess compliance with these principles. A violation of this Code of Conduct may result in required corrective action, cancellation of purchase order(s) and/or termination of the business relationship.



Global Vendor Social Compliance Program

TJX's global vendor social compliance program is coordinated by our AVP, Global Social Compliance, who has specific responsibility for managing and overseeing our ethical sourcing program.



Our AVP, Global Social Compliance, reports to the Senior Vice President, Chief Risk and Compliance Officer, and works closely with representatives of the different purchasing functions across all of TJX's businesses and with the Vendor Social Compliance Committee. This global social compliance position interacts on a regular basis with UL, Intertek and Omega Compliance Ltd. (Omega), all of which are external organizations with extensive experience in ethical sourcing. The position also relies on other internal and external resources for the development of vendor and buying agent training, monitoring and remediation.

Our Vendor Social Compliance Committee is overseen by TJX management, representing the U.S., Canada and Europe and from relevant disciplines within TJX, including merchandising, sourcing, imports, compliance, enterprise risk management, legal and global communications. The Committee meets on a regular basis and oversees compliance of TJX's vendor social compliance initiative. Committee members work closely and cooperatively with the AVP, Global Social Compliance, on responding to significant issues.

We source from a universe of more than 17,000 vendors in over 100 countries, and the majority of product we sell is brand name merchandise. That said, some of our merchandise is manufactured for us and some is designed by our own fashion and style experts, particularly when what we are seeing in the marketplace isn't the right value for our customers, meaning the right combination of brand, fashion, price and quality.

We believe our vendor social compliance efforts are best devoted to products we have designed because this is where we are most likely to be able to have a meaningful impact.

**FOR US,
VALUE IS A
COMBINATION OF
BRAND,
FASHION,
PRICE
AND
QUALITY.**



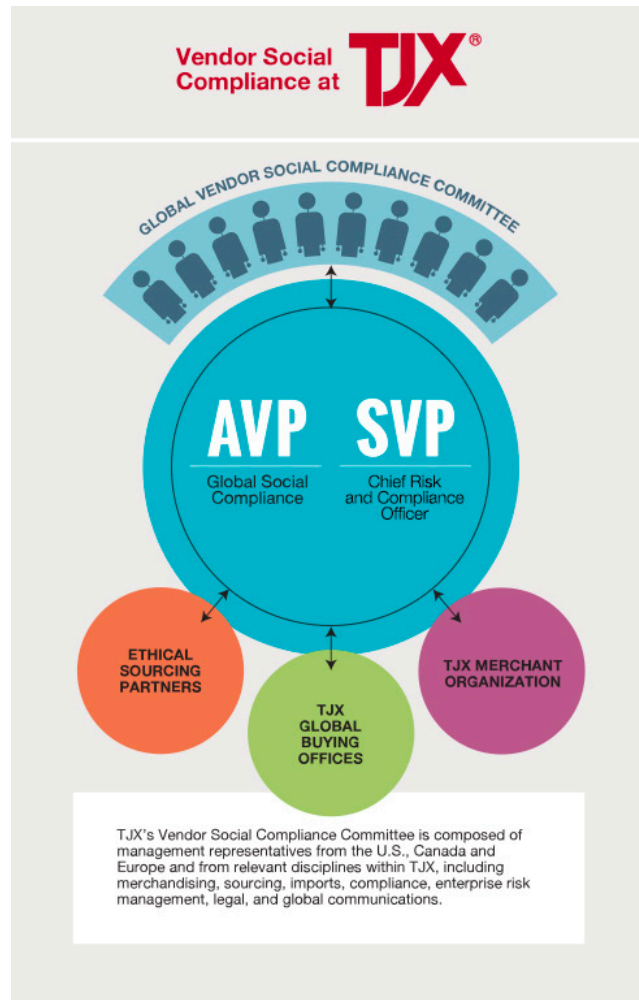
Third-Party Resources and Support

As we continue to develop and evolve our vendor social compliance program, we engage with various audiences and consider their guidance:

- We have reviewed and incorporated many of the international human rights standards enunciated by international bodies such as the United Nations and the International Labor Organization.
- We have received and incorporated valuable insights and suggestions from socially responsible investors.
- We have retained several organizations that have extensive experience and knowledge in the field of ethical sourcing – UL, Intertek and Omega – to assist us with program development, education and training, and compliance monitoring. Our process includes the involvement of TJX internal buying staff and others involved in the day-to-day management of sourcing issues.
- We are members of the National Retail Federation, the Retail Industry Leaders Association, Ethisphere's Business Ethics Leadership Alliance and the Ethics & Compliance Officer Association.
- We participate in industry conferences and stay current on the latest developments in vendor compliance and ethical sourcing.
- Finally, we have reviewed and benchmarked ourselves against the programs of companies comparable to ours.

Factory Monitoring Program

When we source product we have designed, we require the buying agents and vendors that are involved to identify any active factories that they use, or intend to use, to produce such merchandise.





We and our representatives work closely with our agents and vendors so that they understand our vendor social compliance program and our Vendor Code of Conduct. We created the TJX Global Social Compliance Manual, which contains among other important guidance, an audit procedure outline and factory evaluation checklist to help prepare the factory for the audit process. This tool is available in six

languages and offers detailed information designed to help our agents, vendors and factory management better understand the expectations of our Vendor Code of Conduct, as well as the monitoring and corrective action processes. We require our buying agents to disseminate this manual to their entire TJX vendor base.



Factory Auditing

Factories manufacturing our products are expected to cooperate fully with us and our auditors and to provide access to facilities and documents. We have developed comprehensive compliance program guidelines for our third-party factory auditors. We regularly review and, as appropriate, modify these guidelines to try to ensure that they are consistent with evolving vendor social compliance issues and trends.

On-site audits conducted by our independent monitors and principal buying agents generally include one to two full working days at each audited factory, and include the following components:

- Interview with factory management (opening meeting)
- Policy, payroll and documentation review
- Factory walk through
- Health and safety inspection
- Confidential worker interviews
- Debrief with factory management (closing meeting)

Our AVP, Global Social Compliance, participates in shadow audits with TJX's independent auditors and with our buying agents' in-house compliance auditors. Shadowing is practiced in order to gain a better understanding of the compliance audit process and challenges, and to better aid TJX in our review of both our audit results and, more broadly, our program's effectiveness.

Corrective Action and Remediation

At the conclusion of an audit, a Corrective Action Plan (CAP) is created, if necessary, and all concerns are discussed by the auditors with factory management. Factory management is requested to sign the CAP to verify their understanding of the findings. A copy of the CAP is left with management to assist them in resolving the violations or deficiencies detected during the audit. A copy is also transmitted to TJX's AVP, Global Social Compliance. To encourage collaboration with our buying agents and vendors, a copy of the CAP is also forwarded to their attention following a third-party audit.



For lower risk deficiencies, our buying agents or direct vendors are expected to provide evidence to us demonstrating that remedial action has been carried out. However, where moderate to more serious violations of the Vendor Code of Conduct or the local laws are detected, we require that our third-party monitors re-audit the factory. Problems are tracked and vendors are notified of the expectation of remedial action. There are several issues that we consider “zero tolerance” issues. That is, we would immediately terminate the relationship if a factory is found to be in violation of this aspect of our program, including for example, issues like bribery/corruption; child, prison, slave or forced labor; human trafficking; maintaining a facility with all doors and/or exits locked; and failure to pay any wages.

When a problem requires remediation, we expect that continuous improvement is verified during the re-audit. Our general goal is that each re-audit demonstrates measurable improvement from



the prior audit. If a factory receives several consecutive noncompliant grades, this pattern may suggest that required remedial action is not being undertaken.

Though we strive to work with vendors to address and resolve shortcomings in their operations, under extreme circumstances, we must conclude that we can no longer do business with certain factories, or that they will be precluded from producing goods for us until they

demonstrate that they have addressed the situation and have put management systems in place to prevent a recurrence.

Our preferred approach, however, is to work with vendors whenever possible to address and resolve issues identified during audits of their facilities because the reality is that improving working conditions in factories in underdeveloped countries is an ongoing effort. TJX, like other retailers, is facing this challenge. Our goal, when possible and reasonable, is continuous improvement of conditions at factories. This is preferable to ceasing business with these factories and gives us the ability to influence positive change. We believe that this “continuous improvement” model is in the best interest of the workers in the facilities from which we source goods.

Integral to the success of our compliance program is ongoing involvement and partnerships between TJX, UL, Intertek, Omega, our buying agents and vendors to address shortcomings identified in audits and to work toward improvement.

Encouraging Environmental Responsibility

In keeping with our commitment to protect the environment, audits conducted on behalf of TJX include a review of factory policies, practices and procedures concerning the handling of chemicals and other hazardous waste, and a review of whether the factory is in compliance with all applicable environmental laws and regulations. Our Vendor Code of Conduct strongly encourages our vendors to share our commitment to protecting the environment by operating in a sustainable manner where possible, for example by conserving and protecting resources such as water and energy, and taking into consideration environmental issues that may impact local communities. Furthermore, our supplier training program has been expanded to include considerable coverage of the protection and conservation of water.



Vendor Social Compliance Training

Since 2005, we have conducted over 100 training sessions for our buying agents, vendors and management at factories around the world. Sessions have been held in China, Korea, Taiwan, Turkey, India, Indonesia, the Philippines, Thailand, Vietnam and the United States.



These training sessions were conducted by either UL or Intertek representatives, who were accompanied by our AVP, Global Social Compliance. We believe that the presence of our management at each of these sessions in each of these countries demonstrates to factory management, buying agent management and vendors that TJX is committed to our vendor social compliance program. Over time, our training sessions have included the following topics:

- Review of TJX's Vendor Code of Conduct and of the expectations contained in this Code
- Review of local labor laws
- Review of anti-bribery laws (including the Foreign Corrupt Practices Act and the U.K. Bribery Act) and product compliance requirements
- Business ethics
- Discussion on TJX's policy against forced and involuntary labor, including slavery and human trafficking
- Fire safety training
- Water conservation recommendations
- Best practices and preventative actions
- Case studies to help demonstrate how to embed management remediation systems
- Open discussions with vendors and factory management on compliance challenges



Because of the strong, positive feedback from our agents and vendors, we will continue to devote resources to these important training initiatives and to review and update these initiatives as appropriate.

Associate Training

We also organize formal internal vendor social compliance training for TJX Associates involved in the development and buying of merchandise. Our Associates undergo training biennially. In addition, through informal meetings and discussions, our AVP, Global Social Compliance, continues to update our buying personnel on the requirements of TJX's vendor social compliance program.





Responses to Evolving Issues

Including Bangladesh, Uzbekistan, California's SB 657 and Conflict Minerals

Since 1999, we and our buying agents 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.



We take issues that impact the retail industry very seriously and discuss our response to the issues in Bangladesh and Uzbekistan below, along with TJX's position against involuntary and forced labor, as well as our California SB 657 statement. We are similarly committed to compliance with regulations on conflict minerals and have described our general approach and policy below.

Bangladesh

The tragedies that took place in Bangladesh in 2012 and 2013 clearly focused retailers' and manufacturers' attention on remaining vigilant and monitoring whether their policies and practices are adequate and appropriate. Although very little of the product manufactured for us is made in Bangladesh, worker health and safety have always been a significant part of TJX's vendor social compliance program, and we have further strengthened our focus in these important areas.

We have expanded our audit programs based on evolving industry recommendations regarding auditing the fire safety practices of factories. We have elevated the importance of fire safety in our external supplier and internal buyer training programs and posted a message about our workplace safety expectations on our vendor intranet site as well. Going forward, we plan to continue to follow the various Bangladesh-focused initiatives of the retail industry in order to glean any insights that might enhance our own global vendor social compliance program.



Uzbekistan

Consistent with our commitment to high standards and social responsibility, since 2009, we have been attentive to the reports of alleged forced child labor in Uzbekistan. We have notified our global vendor base that TJX prohibits the use of child labor in any phase of manufacturing of its goods for sale, and it is our expectation and our requirement that our vendors will not knowingly use any cotton sourced from Uzbekistan. A letter on our policy regarding Uzbekistan cotton is posted on our intranet for vendors. Our vendors are also reminded of our policy regarding Uzbekistan cotton during our vendor training sessions.

On three separate occasions, TJX was a signatory among many other companies, civil society organizations and investors on letters urging the Government of Uzbekistan to ensure there is an immediate cessation to forced child labor in the cotton fields. In the past, we have participated in multi-stakeholder meetings to address this issue in Washington, D.C., New York and Brussels. TJX continues to participate, along with over 160 other brands and retailers, as a signatory on a pledge, sponsored by the Responsible Sourcing Network, to not knowingly source Uzbek cotton until the Government of Uzbekistan eliminates the practice of forced child and adult labor. We also continue to participate in periodic multi-stakeholder calls to stay current on this matter.

TJX's Position Against Involuntary or Forced Labor, as well as Our Statement for California's Transparency in Supply Chains Act (SB 657)

TJX's vendor relationships are based on a mutual commitment to uphold the high ethical standards embodied in our Vendor Code of Conduct and vendor social compliance program. As a condition of conducting business with TJX and as a means of self-certification, all merchandise vendors agree to comply with our 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.

We contract with both independent auditors (including UL and Intertek) and other third parties (such as our buying agents) to conduct social compliance audits at factories for suppliers of products that we have designed, and to evaluate and address risks of forced labor, including slavery and human trafficking. We created the TJX Global Social Compliance Manual, which is available in six languages and contains an audit procedure outline and factory evaluation checklist, to help the affected factories better understand our Code 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 Code, including our prohibition of involuntary or forced labor. Vendors are expected to cooperate fully with the audits and to provide the auditors with full access to their facilities, employees and documentation. 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. TJX has procedures to take appropriate steps should we learn that a vendor is failing to meet our standards, including remediation, cancellation of purchase orders and termination of our business relationship.



With respect to internal accountability, our TJX Global Code of Conduct prohibits behavior that creates an intimidating or hostile work environment, and it requires 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 obligated to select vendors who act with integrity and in a manner consistent with the ethical principles stated in our Code. TJX reviews reported concerns and takes appropriate action depending on the nature and severity of the violation.

TJX provides biennial training for Associates and 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, slavery and human trafficking.

We believe that these efforts underscore to our vendors, buying agents and Associates our commitment and seriousness of purpose with respect to the ethical sourcing of our products.

Conflict Minerals

At TJX, we are committed to complying with the rules and regulations impacting our business, including those under Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act, intended to address violence and human rights abuses in the Democratic Republic of the Congo (the DRC) and adjoining countries. These rules require public companies to determine if they manufacture or contract to manufacture any products where “conflict minerals” – specifically tin, tantalum, tungsten and gold – are necessary to the functionality or production of the product, and if so, whether those minerals originated in the DRC or adjoining countries. Companies are required to do additional diligence about the source and chain of custody of those minerals that may have originated in the covered region to determine if they came from sources that benefitted armed forces in the region.

As demonstrated by the TJX Vendor Code of Conduct and our vendor social compliance program, we believe in responsible sourcing. TJX is many layers removed from the mining, smelting or refining of any minerals contained in the products we sell, so we must rely on our vendors to collect current, complete and reliable information to comply with these rules. We expect our affected vendors not to knowingly supply us with products that include conflict minerals that directly or indirectly benefit armed groups in the DRC or adjoining countries. We further expect our vendors and buying agents to comply with our requests to provide us with information and perform due diligence regarding their sourcing of the minerals at issue. We will consider appropriate remediation steps if we find that a vendor has violated this policy.

To raise questions or concerns about these issues, please contact us at complianceofficer@tjx.com.

Continuing Our Commitment

Vendor social compliance is a tremendously challenging undertaking, and we know that we do not have all of the answers. Indeed, no company does. We believe we are responding to the challenge by making our commitment clear to our vendors, buying agents and Associates; by our auditing and training efforts; by responding to issues as appropriate for our business; and by reporting about our efforts in this eBook and in the corporate responsibility section of our website.

SPOTLIGHT

Ethical Business Practice is Central Theme for Merchant Training

“ Integrity guides everything we do at TJX; our actions reflect who we are as a Company and how we are perceived in the marketplace. ”

Marney Letendre
Assistant Vice President,
Global Social Compliance



At TJX, an important part of our global vendor social compliance program is the training that we develop specifically for those involved in developing and buying our merchandise. This training, which is updated regularly and offered at least once every 24 months, is designed to educate our merchant organization on the global, ethical and legal issues involved when sourcing goods for our stores and e-commerce channels.

We believe this active dialog with our buyers about our commitment to ethical business practices is a key part of our success. Our training sessions were created and are led by our head of Global Social Compliance, who reviews our expectations of vendors as guided by our Vendor Code of Conduct. Our training includes discussion of important issues such as:

- **Worker health and safety**
- **Working hours**
- **Environment**
- **Stakeholder expectations**
- **Prohibition of child labor**
- **Prohibition of harassment or abuse**
- **Subcontracting**
- **Wages and benefits**
- **Discrimination**
- **Monitoring and compliance**
- **Reputation management**

Additionally, the training program discusses the prohibition of bribery and corrupt business practices, including coverage of the Foreign Corrupt Practices Act and the U.K. Bribery Act.

Our program is interactive and engaging – providing a series of thought-provoking questions for our merchants to consider as well as practical exercises for role-playing situations that our merchants may face in their daily negotiations. At the close of each training session we expect our buyers to possess the knowledge necessary to educate our vendors on our guidelines for ethical business practices.