HONESTY AND INTEGRITY ARE ALWAYS IN STYLE

TJX GLOBAL CODE OF CONDUCT
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Dear Associate:

Acting with integrity is at the core of everything we do here at TJX. Since our Company’s inception over 35 years ago, integrity has been ingrained in our culture and has become part of our DNA. As a Company of Choice, we must continue to leverage our differences and diversity, as well as respect each other and treat each other with fairness and dignity. This commitment to integrity will continue to serve as our compass as we work to help TJX grow to $40 billion and beyond.

Your efforts, and the efforts of all of our Associates combined, play a fundamental role in establishing TJX as a workplace in which different perspectives, ideas and opinions are valued. We are all responsible for advancing TJX as a “teaching organization,” and creating a work environment that places tremendous emphasis on honest and open communication. The reputation of this Company ultimately rests in the way each one of us—at every level, in every area of our business, in all of our dealings—conducts ourselves.

The pages that follow in the TJX Global Code of Conduct (or the Code) illustrate how, individually and as an organization, we are expected to uphold these values when dealing with customers, business partners, shareholders, and fellow Associates. Compliance with the law is the minimum expectation. Our continued pursuit of the highest standards of integrity and business ethics has always and will continue to be a cornerstone of our success.

We expect you to read, understand and comply with the Code, and we strongly encourage you to report any violations. If you have read the Code in the past, please do so again, as it has been updated to reflect certain areas such as environmental sustainability, continued focus on anti-bribery laws, and Associate use of Company-sponsored social media. Everyone at TJX is expected to know and comply with the policies that relate to their specific job function. If you have any questions or concerns about the guidelines included in the Code, we encourage you to seek answers from the many resources provided throughout this Code.

Thank you again for your commitment to our Company and to maintaining our long tradition of acting with integrity in every aspect of our business.

Sincerely,

Bernard Cammarata  Carol Meyrowitz
Chairman                             Chief Executive Officer
TJX is committed to conducting business in compliance with applicable laws, rules, regulations and Company policies. We are also committed to performing with the highest levels of integrity. We uphold our core values of openness and integrity and treating others with dignity and fairness. We expect this commitment to be shared throughout our global operations. In this Code, when we say TJX, we mean TJX and any of its businesses or subsidiaries, worldwide.

By working for TJX, we have each made a commitment to acting ethically, in accordance with our Company’s core values and in compliance with our Code, Company policies and the law. This Code and the policies that support it are generally available in our stores, distribution centers, offices and our Company intranet (the Portal), or through your supervisor or Human Resources Business Partner. Keep in mind that some departments and positions also have specific policies that apply to them, so we all must be sure to take the time to understand what applies to us.

Acting ethically and doing business according to our values is an essential part of every job at TJX. We are expected to understand what is required of us by law and as a part of the TJX community. This Code serves as our guide for ethical business conduct and includes key topics and additional resources to help each of us work through ethical issues we may face. While the Code may not cover every situation you may come across, it sets out the basic principles for working in a way that reflects our Company's commitment to ethics and integrity.

OUR COMMITMENT

IT IS IMPORTANT TO:

- Read and understand this Code and all Company policies related to your job function.
- Ask any questions you have about the Code or Company policies.
- Follow the Code, all Company policies and the law at all times.
- Remember that ethics and integrity are essential parts of your job and that you are accountable for your actions.
- Promptly notify your supervisor or a member of management of any activity you think may violate the Code, Company policies or the law.
- Cooperate with any form of Company investigation, including those related to the Code, Company policies, or the law.

AND REMEMBER IT IS JUST AS IMPORTANT NOT TO:

- Violate the Code, Company policies, or the law even if someone (including an executive, manager or supervisor, or a supplier, vendor, contractor or customer) suggests doing something that would be a violation of the Code, Company policies or the law.
- Tell someone else to violate the Code, Company policies or the law.
- Ignore or cover up a possible violation. Remaining silent may allow the situation to continue or worsen and may even give the appearance of condoning wrong behavior.
- Retaliate against or victimize anyone for raising a question or concern, making a good-faith report of a possible violation of the Code, Company policies or the law, or cooperating in an investigation.
Everyone employed by TJX is an Associate of the Company. This Code applies to all of us, worldwide and at every level, whether working in our stores, buying offices, distribution centers, home offices or elsewhere. No one is exempt from following our Code, regardless of position or job responsibilities.

### LEGAL COMPLIANCE AND INTERNATIONAL OPERATIONS

TJX conducts business in many countries around the world. As a result, we operate under many different laws and within many different customs and cultures. Regardless of where we are doing business, we must follow the high standards of our Code at all times. We must also obey applicable laws and regulations of the countries in which we are operating. Always obey the law. You should familiarize yourself with the laws and regulations that relate to your job. If a conflict occurs between applicable laws and the requirements of this Code, you should contact your immediate supervisor or the Legal Department before taking any action.

### THIRD PARTIES

TJX expects all of the third parties we work with—including our merchandise vendors, other suppliers, brokers, agents, consultants, contractors and other service providers—to act with integrity and in a manner consistent with the principles stated in this Code. If you are authorized to do business with a third party on behalf of TJX, select a company or person that has a reputation for integrity and acts in a responsible manner consistent with our standards. In addition, see the Information Management section of the Portal for more guidance on selecting third parties that would have access to certain kinds of company information.
WHO TO CONTACT

At TJX, we believe we should all have the opportunity to speak openly and be treated fairly. Our Open Door philosophy is intended to support this core belief in honest, respectful communications. If you have ideas, questions or concerns you would like to discuss, there are many ways to do so. Contact information is listed here and in the Contacts & Reporting section at the end of the Code.

If you have a question or learn of something that may violate the Code, Company policy or the law, contact one of the following resources:

(When calling internationally, don’t forget to dial your country’s exit code + destination country code + phone number)

- Your immediate supervisor
- Your supervisor’s manager or another manager in your area
- An executive in your area
- Your Human Resources Business Partner
- The TJX Legal Department: 508-390-6550, or lawyer@tjx.com
- The TJX Internal Audit Director: 508-390-6540, or corporateauditdirector@tjx.com
- The TJX Chief Compliance Officer: 508-390-6570, or complianceofficer@tjx.com
- Your local Legal Contact or Compliance Contact (see the Contacts & Reporting section)

In many instances, speaking with your supervisor will be the most effective way to address your concern. However, if you are not comfortable talking to your immediate supervisor about the issue, feel free to contact any of the resources above.

If you prefer to speak to someone outside TJX, contact the TJX Helpline.

The TJX Helpline is an additional resource available to allow you to voice your concerns (subject to local law or regulation, which may limit certain kinds of reporting). It is staffed by an outside service provider around the clock, every day of the year. Providing details when you call the Helpline can assist TJX in answering your questions or resolving your concerns more promptly. Although you are encouraged to identify yourself, you may remain anonymous when calling the Helpline unless doing so is prohibited by local law or regulation.

Regardless of whether you choose to identify yourself, anything you discuss with the Helpline will be kept confidential to the extent reasonably possible and in accordance with applicable law. The main Helpline numbers are:

- For North America: 800-TJX-6488
- For the U.K. and Ireland: 0800 328 1542

In other countries, please call or email your local Compliance or Legal contact. See the Contacts & Reporting section of the Code for this additional contact information.
If you have an information security or privacy concern:

To help maintain a safe and secure work environment, you are required to report certain situations involving our information security. If you learn of any actual or suspected threat to TJX’s information security, report it to:

• For electronic events: Security Operations Center (the SOC): 508-390-2164
• For other events (paper or non-electronic): Loss Prevention: 508-390-2277

If you learn of any actual or suspected violation of TJX’s Information Security Policies or Privacy Policies, report it to any of the following:

• The SOC: 508-390-2164
• Your immediate supervisor or other reporting contact identified in the Code
• The TJX Helpline

In addition, if you receive a customer inquiry or complaint about TJX’s handling of personal information, send the inquiry or complaint to any of the following:

• Customer Service (U.S.): 866-484-6978
• Privacy Office (Canada): 905-405-7530
• Data Protection Lead (Europe): data_protection@tjxeurope.com
• Store management, if applicable

(When calling internationally, don’t forget to dial your country’s exit code + destination country code + phone number.)

Reported concerns or allegations will be investigated.

TJX will promptly look into all reported concerns as confidentially as possible and take any necessary action. Discipline for violations of this Code or Company policies will vary, depending on the nature and severity of the violation. Discipline could include corrective action, up to and including termination. Some violations may also be reported to criminal or civil authorities, as required or appropriate.

RETLATION/VICTIMIZATION WILL NOT BE TOLERATED.

It’s important that all of us feel safe and comfortable speaking up about our concerns. TJX will not tolerate any form of retaliation against or victimization of Associates or others for making good-faith reports of possible violations of the Code or for asking questions about the Code, Company policies or applicable laws. Making a report in “good faith” means that your report is true to the best of your knowledge and that you have provided all of the information you have. Anyone who retaliates (or attempts to do so), knowingly makes a false accusation, or is uncooperative or untruthful during an investigation will be subject to disciplinary action, in accordance with Company policies and applicable law.
SPECIAL REMINDERS TO SUPERVISORS, MANAGERS AND EXECUTIVES

Our culture of integrity and compliance starts at the top. All members of management must not only fulfill their duties, but also assume responsibility for those who report to them. If you are a supervisor, manager or executive, you must carefully follow the principles listed below.

**IT IS IMPORTANT TO:**

| ✔ | Earn respect and lead by example—your Associates expect you to do the right thing. |
| ✔ | Understand this Code and all Company policies that affect your job as well as the positions you supervise. Help your Associates understand this information. |
| ✔ | Promote compliance with the Code—even in difficult situations. |
| ✔ | Create an environment of integrity, accountability and mutual respect that supports doing the right thing. |
| ✔ | Encourage Associates to bring ideas forward, ask questions, voice concerns and report any possible violations. |
| ✔ | Listen carefully when an Associate brings a potential problem to you. Consider what should be done. If there is a possible violation of the Code, contact your Human Resources Business Partner or another appropriate local contact or contact from the Compliance Department immediately. |
| ✔ | Direct Associates to the appropriate resources for your location, as necessary, including your manager, other executives, your Human Resources Business Partner or other resources listed in the Getting Help & Raising Concerns section of the Code. |
| ✔ | Contact your Human Resources Business Partner whenever you need a clarification on next steps to take. |

**AND REMEMBER NOT TO:**

| ❌ | Ignore or cover up a possible violation. |
| ❌ | Allow a situation to continue or worsen, or give even the appearance of condoning wrong behavior. |
| ❌ | Retaliate against or victimize Associates who report possible violations or voice concerns about the Code, Company policies or applicable law. |
| ❌ | Permit or tolerate retaliation by others. |
**DIVERSITY**

*We value the diversity of our fellow Associates.* We must all stay committed to creating an environment of inclusion and promoting workplace diversity at TJX. By doing so, we retain our wide-ranging mix of talent and build upon our fellow Associates’ various experiences to make TJX a Company of Choice. We consider the unique views and opinions of our fellow Associates to be key drivers of our future growth and success.

**NO DISCRIMINATION**

*We treat each other with honesty, dignity and respect.* At TJX, we recognize that, together, our Associates bring the Company a unique set of abilities and perspectives. Our diversity makes us stronger as a Company and better able to meet the needs of our customers. TJX does not permit unlawful discrimination of any kind. It is against Company policy and the law to base any employment-related decisions on an individual’s race, color, religion, sex, pregnancy, age, national origin, ancestry, sexual orientation, disability, gender identity or expression, marital status, military status, political beliefs or other legally protected status under applicable law.

TJX also provides reasonable accommodations in the workplace for qualified individuals with disabilities consistent with applicable laws.

**NO HARASSMENT**

*We do not tolerate harassment at TJX.* As TJX Associates, we are all expected to act in a professional manner and to avoid any action or behavior that, if unwelcome, may be considered harassment or sexual harassment. “Harassment” includes any conduct that unreasonably interferes with an individual’s work performance or creates an intimidating, hostile or otherwise offensive environment. Harassment can take many forms, including using slurs, epithets, or inappropriate gestures or making demeaning jokes. Regardless of the form it takes, behavior like this is not tolerated.

TJX also will not tolerate sexual harassment, in whatever form. Examples of sexual harassment include:

- Inappropriate or unwelcome sexual advances
- Unwanted sexual suggestions or comments of a sexual nature
- Requests for sexual favors
- Unwanted physical contact
- Sending inappropriate emails, texts, instant messages or other communications (sexually explicit or otherwise)

No one at TJX may base business or employment decisions on requests for sexual favors, submission or rejection of sexual advances, or other verbal or physical conduct of a sexual nature. If you think you or someone else has been subjected to any form of harassment at TJX (whether by an Associate, customer, contractor, vendor or supplier) you are strongly encouraged to report it to your immediate supervisor, another manager in your area or your Human Resources Business Partner. See the list of resources in the Getting Help & Raising Concerns and the Contacts & Reporting sections of the Code.
Complaints of harassment, sexual harassment or discrimination are serious matters. If you are a supervisor and hear an allegation of harassing behavior, you are expected to act promptly and to appropriately notify a Human Resources Business Partner. If an investigation confirms improper conduct occurred, TJX will take appropriate disciplinary action.

Remember, no matter which method you choose to use to report your concerns, we prohibit any form of retaliation or victimization against you for making a good-faith complaint.

**IT IS IMPORTANT TO:**

- Recognize the unique abilities and perspectives of fellow Associates.
- Recognize and value fellow Associates based on their contributions.
- Treat fellow Associates and others with honesty, dignity and respect.

**AND REMEMBER NOT TO:**

- Discriminate against or harass anyone in the workplace.
- Make remarks, gestures, slurs or jokes that demean another person.
- Make inappropriate sexual advances or comments or request sexual favors.

For more information, please see the TJX Harassment and Discrimination Policies, available on the Portal or through your supervisor or Human Resources Business Partner.

**ASSOCIATE WAGE AND HOUR RULES**

We follow all applicable wage and hour laws and regulations. We must comply with all applicable laws and regulations on wage and hour practices. This includes requirements related to working without compensation (sometimes referred to as working “off the clock”), working during meal and rest breaks, overtime pay, termination pay, minimum wage, and hours and payment of minors.

To ensure you are properly paid for your work, report and record your time in accordance with local procedure. Do not work without compensation (off the clock) or ask someone else to do so. All hours worked by hourly Associates (or other comparable timekeeping Associates under local law) must be recorded in the applicable Company timekeeping system.

Do not falsify time records to either increase or decrease your work time or the work time of others, including those whom you supervise. Never punch a clock (punch in or out) for another Associate and never have another Associate punch in or out for you. You may not work more than the maximum number of hours permitted by law. If you are eligible for overtime pay, you are required to have any overtime work or additional work authorized by a supervisor. Do not work from home unless you are specifically authorized to do so.

If you are responsible for recording or supervising timekeeping for others, you must ensure that Company payroll practices are followed. Talk to someone, like your Human Resources Business Partner, if you have any concerns.
HEALTH AND SAFETY

We work hard to provide clean, safe and accessible facilities for our customers and our fellow Associates and to protect each other and our customers from avoidable injury in the workplace. Our health and safety—and that of our fellow Associates and local communities—are a vital part of TJX’s operations. Our Company implements global safety policies and procedures to protect and preserve our well-being.

As Associates, it’s important that we remember to:

• Be prepared. Learn the safety and emergency procedures for your workplace, available on the Portal or in your Emergency Response Guide. If you have questions, ask your supervisor or manager for help.

• Report injuries immediately. Report any accident or injury, no matter how minor, to your immediate supervisor or manager.

Whether you work in a store, distribution center or office, you can help keep the workplace safe by taking the following actions:

• Be alert for any potential hazard you can reasonably correct yourself. If you do not have the skills, tools, training or authorization to resolve a health or safety issue, seek help from someone else who does.

• Immediately report any potential hazard you cannot correct yourself, no matter how minor, to your immediate supervisor or manager. If the situation is not addressed, contact the Risk Management Department or the Health & Safety Department.

• Request immediate medical attention for an injured or seriously ill person.

NO SUBSTANCE ABUSE

We do not tolerate or engage in substance abuse in the workplace. In many cases, not only is substance abuse against the law and Company policy, but it can pose a threat to the safety of our work environment. This means, in part, that no one may report to work, come onto Company property, drive a Company vehicle or perform any job-related activity while under the influence of alcohol or illegal drugs. All applicable drug laws must also be followed. Use of illegal drugs during work time...
or while on Company premises or engaging in any illegal activity involving drugs or alcohol while working on the Company’s behalf or on Company premises is not allowed. However, in limited situations, alcohol may be available at certain approved Company events. If you choose to drink at any Company-sponsored event where alcohol has been approved, do so responsibly and only in moderation.

It is important to keep in mind that an “illegal drug” means any controlled substance that applicable law prohibits us from using or possessing. This includes prescription medications not prescribed for you or not used as prescribed. If you take prescription drugs that may affect your ability to perform your job safely, you are strongly encouraged to inform your immediate supervisor or another member of management of this issue. TJX will work with you to explore your options.

NO VIOLENCE IN THE WORKPLACE

We do not engage in violence or make threats of violence. TJX has strict standards against violence and threats of violence in the workplace. This means you must not threaten violence, use offensive language or engage in verbal abuse, harassment, intimidation or violent behavior in any form. TJX will not tolerate violent behavior or threats directed toward Associates, customers, contractors, vendors, suppliers or anyone related to TJX, whether in or out of the workplace or on or off the clock. In addition, TJX prohibits weapons on Company property to the fullest extent allowed by law. You should immediately report violence, threats of violence, and weapons brought onto Company property to your supervisor or to your Loss Prevention department.

IT IS IMPORTANT TO:

- Be prepared for emergencies that might happen at your workplace.
- Follow all applicable drug laws.
- Report any acts or threats of violence and any weapons on Company property immediately.

AND REMEMBER NOT TO:

- Try to correct hazards in the workplace yourself when you don’t have the skills, tools, training or aren’t authorized to do so.
- Use or bring weapons, alcohol or illegal drugs on or onto Company property.
- Threaten violence or participate in any form of violent behavior.
OUR CUSTOMERS

Our customers are a top priority. The success of our Company rests upon the trust and satisfaction of our customers. We should treat our customers as we treat one another—with dignity and respect—and provide all customers with the highest quality service at all times.

We respect the people we interact with. TJX enjoys a reputation for integrity that is based on our culture of respect for different perspectives, ideas and opinions, as well as our commitment to high standards. When working with anyone, whether a customer, contractor, supplier or vendor, we must uphold TJX’s core values of openness, integrity and treating others with dignity and fairness. Just as we do not harass or discriminate against our fellow Associates, never harass or discriminate against our customers or others with whom we do business under any circumstances.

We are committed to protecting the personal information of our customers. Personal information about our customers, along with that of our fellow Associates and other parties, must be shared only in accordance with our Information Management Policies, which means, among other things, it must be guarded carefully and only shared in a limited way.

For more information, review the TJX Information Management Policies, available on the Portal or through your supervisor or Human Resources Business Partner.

HONEST BUSINESS PRACTICES

We uphold high standards of integrity in our business dealings and do not engage in dishonest business practices. Dishonest business practices can take many forms, including conduct like theft, fraud and making false or intentionally misleading statements. It can also mean omitting information (or presenting incomplete information) in a way that is intentionally misleading, falsifying Company records (including payroll and timekeeping records), financial wrongdoing of any kind and misusing Company systems, like the markdown process, for your own or anyone else’s benefit. Don’t engage in any of this kind of conduct.

FAIR DEALING AND COMPETITION

We compete vigorously, but ethically and with integrity. It is important that we comply with all applicable antitrust and competition laws and avoid engaging in practices that interfere with fair and open competition. This means, for example, that you must not enter into any agreement (whether formal or informal) with our suppliers, vendors or other third parties to restrain trade. Impermissible agreements include agreeing to fix prices in our stores or those of our competitors; agreeing to divide territories, types of merchandise or business lines; or boycotting certain vendors. Avoid discussions with our competitors about these topics, even if they suggest it or if it comes up at a trade event. Remember that global competition laws, including antitrust laws in the United States, are complex and that the consequences of violating them can be serious for the individuals involved and for TJX. It is important to be familiar with the applicable laws and keep them in mind while you do your job.

We do not engage in unfair or fraudulent business practices. Never use unfair conduct to help TJX’s business or to hurt a competitor’s business, either directly or through a third party (like an agent or broker). Do not use dishonesty, misrepresentation or other illegal or unethical means to learn competitors’ trade secrets or obtain confidential information about other companies.
Do not offer or accept bribes, kickbacks, or other improper payments, gifts or entertainment to obtain or retain business opportunities or to take away business from a competitor. Our business decisions should never be influenced by improper payments of any kind. See the Anti-Corruption Laws section of the Code for more information.

For more information, review the TJX Global Anti-Bribery Policy, available on the Portal or through your supervisor or Human Resources Business Partner.

We respect the rights and property of other companies, including their trademarks and brands. Just as we are careful with TJX intellectual property and confidential information, we respect other companies’ intellectual property rights. Do not infringe on the trademarks, brands, patents and copyrights of others. Be careful not to violate third-party rights in those or any other forms of intellectual property.

We advertise honestly. Open and honest sales and marketing practices can contribute to the quality and longevity of our business relationships. Comply with applicable advertising laws and standards. Our advertising and marketing must be non-deceptive and fair at all times and must not contain misrepresentations. Be honest and accurate when discussing TJX merchandise and services—don’t be deceptive. In addition, don’t say anything untrue, unfounded or misleading about our competitors or their merchandise or services.

PRODUCT SAFETY

We sell safe, properly labeled merchandise. We take pride in selling products that meet applicable safety standards. We expect and require that our vendors provide us with safe merchandise that meets or exceeds our expectations. We respect the integrity of our merchandise safety testing processes and do not exercise, or attempt to exercise, undue influence on product testing labs in a way that could undermine the objectivity of the results. If you know or suspect that any merchandise is potentially unsafe or mislabeled, inform your immediate supervisor, a member of management, the TJX Product Safety/Risk Department or your local Trading Standards/Risk Management Department right away.

DATA PRIVACY AND PROTECTING PERSONAL INFORMATION

We are committed to the appropriate handling of Personal Information of our fellow Associates, customers and other parties. Personal Information includes all information from or about a person that can be used to identify that individual, such as names, addresses, government-issued identification numbers and credit card numbers. Access to Personal Information must be limited to the minimum amount necessary to fulfill the relevant business purpose of the information. See the Protecting Business Information section of the Code for more on this “need to know” principle. Any sharing or distribution of Personal Information with other Associates or with anyone outside the Company must be limited and narrow to be sure that only the minimum amount of data necessary to achieve the business goal is disclosed. Take all reasonable precautions to avoid inadvertent or inappropriate disclosure of or access to Personal Information.

We are committed to working with third parties that appropriately safeguard Personal Information. When retaining a third party that will have access to or will be handling Personal Information, be sure to follow the requirements specified in the Service Provider Policy, part of the Information Management Program.
CONFLICTS OF INTEREST

We avoid situations that create, or appear to create, a conflict of interest. A conflict of interest exists when a personal interest or activity interferes (or appears to interfere) with the interests of the Company. Conflicts of interest create situations in which our loyalty is, or may appear to be, divided, and can make it difficult to perform our jobs objectively and effectively and to prioritize the Company’s interests (and as such, are improper in the workplace). Even the appearance of a conflict can call someone’s integrity into question. You should always perform your duties for TJX with only the interests of the Company in mind—not for personal reasons or looking for personal gain. Make sure to avoid any situation that creates or might create even the appearance of a conflict. Keep in mind that conflicts of interest aren’t just created by our personal activities, investments and relationships. They can also be created by those of our family members, for example, by our spouses, children, stepchildren, parents, stepparents, in-laws, grandparents, siblings and others who live in our households.

Personal relationships at work can also create, or appear to create, conflicts of interest. Associates in an intimate relationship or friendship with another Associate should not allow the relationship to create an uncomfortable or compromised work environment for others or allow the relationship to negatively impact job performance. In addition:

• You may not directly or indirectly supervise or have oversight responsibility for, or directly or indirectly report to, any Associate with whom you are romantically involved or have an intimate relationship
• You may not supervise, review or influence the job evaluation, pay or benefits of any family member who works at TJX

Some other examples of conflicts of interest are:

• Showing favoritism or otherwise making business decisions based on your personal relationships, rather than on the interests of the Company
• Offering or receiving special consideration or gifts (other than in a manner consistent with our gifts policy)
• Purchasing products for personal use at prices not available to the general public from vendors or suppliers with which TJX conducts, or plans to conduct, business
• Having samples or merchandise shipped to any address other than the TJX workplace
• Purchasing merchandise from TJX to resell

We avoid financial conflicts of interest. In addition to the type of conflicts of interest described above, personal financial activities can interfere with your responsibilities to the Company. A financial conflict of interest can arise when judgment is influenced (or could appear to be influenced) by the possibility of financial gain—either for ourselves or members of our family.

Financial conflicts of interest may arise when:

• You have a financial interest in a vendor, supplier or landlord or a competitor (other than a small investment in a publicly traded company)
• You receive compensation for commenting on our products, stores or industry without TJX’s approval
• You receive compensation from anyone other than TJX for doing your job for TJX
In all situations, you may not use Company property or information or your position at TJX for personal gain. Further, do not take for yourself or direct others to take any opportunity that is discovered through your work at TJX. Business opportunities you discover through work at TJX belong to TJX. In addition, TJX is generally the exclusive owner of any design, concept, invention, formula or similar creation that you develop or create using TJX’s resources or confidential information in the course of your employment with TJX.

We do not compete with TJX. You may not compete with TJX while employed by TJX (subject to applicable law). In addition to examples listed above, competing with TJX includes, if done without the approval of TJX:

• Working for or on behalf of a TJX competitor or vendor
• Serving as a director, manager or advisor of any firm engaged in a business that competes or plans to compete with TJX or that sells or plans to sell to TJX

It is important that potential conflicts with the Company be addressed. Contact our Chief Compliance Officer if:

• You believe you have a conflict of interest or a financial conflict of interest, actual or apparent
• You wish to seek approval or clarification of our policies on conflicts of interest, noncompetition or corporate opportunity
• You wish to pursue outside employment opportunities while employed at TJX

GIFTS AND ENTERTAINMENT

We exercise caution when giving or receiving gifts or entertainment. Giving or accepting valuable gifts or entertainment to or from vendors, suppliers or customers may be viewed as an improper attempt to influence the relationship. Do not solicit anything of value from those who do business (or may do business) with TJX, including gifts, tickets, offers of entertainment, trips, samples for personal use, tips, loans or anything else of value for yourself or for others. If you receive any offers for anything of this kind from anyone with whom TJX conducts business, you should politely but firmly decline. In certain limited circumstances, receiving small gifts of nominal value and business-related entertainment may be acceptable. Always refer to the TJX Gifts and Entertainment Policy and follow any local policies or procedures established by your department or TJX business unit, when considering the appropriate way to handle the offer of a gift or entertainment.

Do not give gifts to anyone with whom TJX conducts business, except gifts of nominal value. Keep in mind that even gifts of nominal value may violate the recipient’s own company policies. You should exercise caution and ask for guidance if in doubt. If you have any questions about gifts and entertainment, ask your immediate supervisor or the applicable Compliance Officer.

Remember, never offer or accept any gift or entertainment opportunity if you feel it could affect your ability to act in TJX’s best interests.

For more information, review the TJX Conflicts of Interest Policy, available on the Portal or through your supervisor or Human Resources Business Partner.
ANTI-CORRUPTION LAWS

We do not engage in, tolerate or permit bribery, corruption or similar unethical business practices. This means that, among other things, we all must follow global anti-corruption laws—including the U.S. Foreign Corrupt Practices Act and the U.K. Bribery Act—in all of our business dealings worldwide (regardless of where we each are located). To help us understand and abide by these laws, we maintain the TJX Global Anti-Bribery Policy, which governs our conduct at all levels of the Company. This policy also applies to specified third parties acting on TJX’s behalf.

Among other things, anti-corruption laws and Company policy prohibit you from giving or accepting any bribe to or from any person—whether or not the other party is a government official or an employee of a company with which you do business. TJX policy also prohibits all instances of offering, authorizing, requesting or promising a bribe.

If you are responsible for hiring a third party, make sure you know they are reputable. The contract should include appropriate anti-bribery language. If the third party is dealing with government entities on our behalf, additional due diligence may be required. Remember, we can’t retain a third party to take any action we are prohibited from taking ourselves. If you work with government officials, request guidance from the Legal Department. See the Interaction with Governments section of the Code.

For more information, review the TJX Global Anti-Bribery Policy, available on the Portal or through your supervisor or Human Resources Business Partner.

If you suspect a violation or have a question about these policies or a related issue, contact:
  • Your immediate supervisor
  • The TJX Chief Compliance Officer or General Counsel
  • The TJX Helpline

As a reminder, TJX will not tolerate any form of retaliation against, or victimization of, Associates or others for making good-faith reports.
INTERACTION WITH GOVERNMENTS

We are truthful and straightforward in our dealings with government entities. We deal honestly and fairly with all government representatives and law enforcement agents. Comply with valid governmental requests and demands for information. If you are contacted by a government or regulatory representative and asked to provide information or to submit to an inspection, inform your manager immediately. Your manager will take appropriate action or contact the appropriate department for guidance. Never provide false or misleading information to any government official or representative or destroy records relevant to an investigation. Similarly, never direct or encourage another Associate to do so.

Important Reminder

If properly identified government representatives seek to inspect a Company facility, ask them to wait while you contact your immediate supervisor, a member of management or the Legal Department. If they will not wait, DO NOT prevent them from entering the facility.

IT IS IMPORTANT TO:

☑ Ask for supervisor approval if you are unsure about a gift.
☑ Consult with the Legal Department when dealing with government officials.
☑ Be truthful when dealing with government entities and comply with applicable laws.

AND REMEMBER NOT TO:

☒ Solicit or accept gifts from anyone with whom TJX conducts business in violation of our policies.
☒ Give gifts or provide entertainment in violation of another company’s policies.
☒ Engage in unethical practices, like bribery or corruption.
USE OF COMPANY PROPERTY

We use Company property for legitimate Company business. We all access many kinds of Company property to do our jobs at TJX. Company property includes tangible items like equipment, supplies and networks, as well as intangible things like information, vendor lists or trademarks. All materials, documents, data, and software, whether written or electronic, relating to our Company are TJX property. Appropriate use of Company property requires common sense and good judgment. It is important to be aware of the kinds of improper use that can expose the Company to legal and financial risk. For example, follow Company procedures concerning acquiring and downloading software and online resources, and protect TJX's computer passwords, computer hardware, computer networks and the information stored on them.

Use TJX property for Company business purposes. In certain instances, we are allowed to use Company property, such as computers and telephones, for limited personal purposes. See the Acceptable Use Policies in our Information Management Program for more guidance. Please keep in mind that, unless otherwise regulated by applicable law, you should have no expectation of privacy in any materials (including emails or text messages) you create, view, access, receive or store on TJX systems or networks. TJX may also inspect the contents of your work space, packages, boxes, personal effects (e.g., handbags, briefcases), lockers, office furniture (e.g., file cabinets and desks), electronic equipment and storage devices (e.g., computers, cell phones and PDAs), and Company vehicles for business or security reasons, where permitted by law.

We safeguard the Company’s trademarks and brands. Just as we keep our Company’s physical assets secure, we must also protect TJX’s confidential information and intellectual property. Our Company trademarks and brands are valuable assets. Never use them improperly or without proper authorization. Our intellectual property includes any legally protected creations such as our copyrights, trademarks, patents, brands, design rights and trade secrets. We must take certain proactive steps to keep our confidential information and intellectual property from being disclosed or misused inadvertently and avoid sharing such information with anyone—even within our Company—unless there is a legitimate business need to do so. If you are not sure that your use of TJX’s intellectual property is proper, ask your immediate supervisor or the Legal Department before continuing your use.

We dispose of Company property appropriately. Company property will be disposed of when it is no longer needed for business purposes. Equipment or electronic media must be disposed of properly in accordance with Company policies. See the Managing Company Documents section of the Code. Do not give away or dispose of TJX property or merchandise, whether current, outdated, damaged or a sample, without advance approval by the appropriate store manager or an authorized TJX representative. Never have samples sent to your home or keep them for personal use. If you leave the Company, you will need to return or properly destroy all Company materials and property, including documents, data and software. Consult with your supervisor.
PROTECTING BUSINESS INFORMATION

We are committed to protecting our Business Information, in other words, the non-public information about our Company's business or affairs. Our Business Information is a valuable asset and must be treated accordingly. Business Information includes, among other things, all information that is sensitive and proprietary to a company or that is not generally known by others outside that company. Business Information can be in written or electronic form and can also be information you know or learn that is not formally documented. A few examples of TJX Business Information are:

- Comparable store sales information
- Details on merchandise TJX intends to buy
- Internal financial projections
- Network configurations
- Vendor and Associate lists

TJX information in any format should be used only for Company-authorized business purposes. That means, in part, that only those who need to know the information to perform their jobs should have access to it. This “need to know” principle must be followed whenever our Business Information is shared, even with other Associates. Do not share Business Information with anyone outside TJX, including our contractors, vendors or suppliers, unless you have appropriate authorization to do so. Even then, be sure that you are sharing the information in accordance with Company policies. If you are not sure if the information can be shared or how best to do so, check first. Business Information should also never be disclosed in online communities or forums like blogs or social networking sites. See the Use of Social Media section of the Code for more details.

Remember that information at TJX is classified according to its level of sensitivity. Certain kinds of Business Information may have more restrictive requirements around collection, handling, storing, transmitting, accessing, security, retention and destruction. The TJX Information Management Policies describe more fully the different classifications of Business Information and how to treat them. Be sure to understand and follow the appropriate requirements for any data you access. Stay current on any policy updates.

For more information, review the TJX Information Management Policies, available on the Portal or through your supervisor or Human Resources Business Partner.

We respect the confidentiality of TJX’s Business Information, even after we leave the Company. As TJX Associates, we know we are responsible for keeping the Business Information in our possession secure while working at TJX. That obligation continues even after you depart from the Company. Company Information should never be used for your own personal gain, or for the gain of another person or company, even if you are no longer employed by TJX.

We do not use Business Information of others without permission. Just as you must be careful with TJX’s Business Information, respect the confidentiality of other companies’ Business Information. Do not bring confidential papers, records or trade secrets from previous employers to TJX. Do not use dishonesty, misrepresentation or other improper means to obtain confidential information about other companies. Respect the obligations other Associates may have to maintain the confidentiality of information of former employers.
MANAGING COMPANY DOCUMENTS

We manage Company documents responsibly. It is important to keep Company documents only as long as they are needed. Review your department’s record retention schedule that specifies which classifications of documents need to be kept and for how long. Remember that any documents subject to a legal hold notice must be retained in accordance with the specific hold notice for those documents. In general, any documents that do not fall under the categories specified in a retention schedule or a legal hold are to be retained while useful but not for longer than two years. Your department’s Record Coordinator will help guide you in any record-keeping responsibilities.

If you have questions or want to confirm who your Records Coordinator is, contact the Privacy Department at tjx_privacy_office@tjx.com.

Dispose of all printed documents in a secure disposal bin in accordance with Company policy. Contact IT Operations or Store Systems to properly dispose of electronic equipment, storage devices, or other electronic media.

For more information, review the TJX Information Management Policies, available on the Portal or through your supervisor or Human Resources Business Partner.

SAFE USE OF TECHNOLOGY

We use Company technologies safely. Do not use any phone, PDA, other handheld electronic device or any other object where or when its use is prohibited by applicable law. The same applies if such use will distract you from driving, operating equipment or otherwise acting in a safe and responsible manner.

For more information, review the TJX Distracted Driving Policy, available on the Portal or through your supervisor or Human Resources Business Partner.
INSIDE INFORMATION

We comply with insider trading laws. Through our work at TJX, we may gain access to information about TJX or another company before it is generally known to the public. Information that is not public and is material is known as “inside information.” Both our policies and the law strictly limit what we can do when we possess inside information.

Information is generally not considered public until it has been effectively disclosed to the public and investors have time to absorb it—generally the next trading day after a public announcement, such as a press release or SEC filing.

Information is considered material if a reasonable investor would consider it important in deciding when or whether to buy, sell or hold a company’s securities. A few examples of information that could be considered material information for TJX or other companies are:

- Business strategies
- Growth plans
- Sales and comparable store sales data
- Earnings and other financial results
- Inventory levels
- Business trends
- Possible acquisitions or dispositions
- Management changes

Do not buy or sell stock or other securities of TJX when you possess inside information about TJX. (This includes exercising an option followed by an immediate sale of the stock on the market.) You also may not buy or sell stock or other securities of another company when you possess inside information about that company. These rules apply to everyone at TJX, as well as their families and entities they control. Trading on the basis of inside information is against our policies and the law.

Within TJX, do not provide inside information, whether about TJX or another company, other than to those who have a business need to know such information, and do not share inside information outside of TJX. Sharing inside information with others, a practice known as “tipping,” is also against our policies and the law. Never tip others to inside information, regardless of whether or not you think they may trade based on that information.

For more information, review the TJX Insider Trading Policy, available on the Portal or through your supervisor or Human Resources Business Partner.

FINANCIAL INTEGRITY

We prepare all Company records accurately, in a timely manner and in compliance with Company policies. We owe it to our shareholders, fellow Associates, customers and others we work with, as well as the public and various governmental offices, to keep accurate and truthful business records.

Our financial books, records and accounts must accurately and completely reflect actual transactions and events. Our processes and controls are designed to ensure that expenditures are incurred and transactions are executed on an authorized basis. They also are designed to ensure that TJX assets
are used properly and that all expenditures, transactions, assets and liabilities are properly reflected in our financial records. All data, certifications and other written materials, as well as internal expense records you create or are otherwise responsible for, must be:

- Complete
- Accurate
- An honest reflection of each transaction, expenditure or other item
- Timely
- Prepared in accordance with applicable accounting rules and standards

You should understand how to accurately prepare all records and complete all control processes required by your job. Be sure to ask your immediate supervisor if you are ever unsure of what is required. As part of keeping Company records, we follow all Company policies and legal requirements concerning document retention and destruction. See the Managing Company Documents section of the Code for more information.

**REPORTS OF ACCOUNTING AND AUDITING MATTERS**

We report suspected violations of financial, accounting or reporting standards. Those of us with accounting, audit, compliance, finance, treasury, tax and investor relations responsibilities have a special obligation to verify the effectiveness of the control environment and the completeness and accuracy of accounting information and financial reports. Contact the Corporate Internal Audit Director or call the TJX Helpline to report any suspected violations of financial, accounting or reporting standards. All reports of possible violations will be taken seriously at TJX.

We cooperate fully with internal and external audits, including responding to internal and external audit requests. Remember that when asked to assist in conducting an investigation of possible violations concerning accounting and auditing matters, we each have a duty to cooperate. Do not improperly influence, coerce, manipulate or mislead any internal or external auditor. In addition, do not encourage anyone else to do so.

**CORPORATE COMMUNICATIONS**

We ensure that our external and internal corporate communications are accurate, consistent and in accordance with the TJX Global Communications Policy, available from the Global Communications department. All public Company information used in internal communications must be consistent with the Company’s external communications.

Only authorized TJX spokespersons are permitted to speak to the media, investors or the general public regarding Company matters. If the media or someone else without specific authorization from the Global Communications Department asks to take photographs or videos or approaches you for information regarding the Company, whether in a formal request or an informal conversation, you should politely say that you are not an authorized Company spokesperson and refer them to your division’s Media Relations Department or to the Global Communications Department at 508-390-2323. Immediately notify a member of management or your immediate supervisor and do not comment in any way. Do not use the phrase “No comment.”

If you receive a media inquiry, refer the individual to your division’s Media Relations Department or Global Communications at 508-390-2323.
# USE OF SOCIAL MEDIA

Social media sites and tools are far-reaching and constantly evolving forms of communication. As the information shared while using social media can be easily accessed by the public, it can have a significant impact on our organizational, professional and individual reputations. Forms of social media include, for example, social and professional networking sites, as well as personal websites, and photo- and video-sharing sites. TJX maintains social media policies across the Company. Among other things, remember that these policies apply to our actions online whether related to TJX or not. The policies, for example, remind us that when our social media content reflects our affiliation with TJX, we should not post any comment about an Associate that is harassing or discriminatory on the basis of any protected characteristic; post any content about the Company, its executives, products or services that is knowingly false; or use TJX’s logos or trademarks in a way that would create confusion about the Company’s products or services or in connection with any content that is illegal or in violation of any TJX policy.

You are responsible for following the applicable Social Media Policy in your area. These policies apply to all Associates worldwide and to certain third parties if they are acting on TJX’s behalf.

## IT IS IMPORTANT TO:

| ✔️  | Follow TJX policies when you post on a forum or an internal online community. |
| ✔️  | Be clear that you are speaking on your own behalf and not TJX’s. |
| ✔️  | Raise concerns about content you think should be addressed with your manager or Human Resources Business Partner. |

## AND REMEMBER **NOT TO:**

| ✗  | Discuss confidential or inside information. |
| ✗  | Make harassing or discriminatory remarks about colleagues online. |
| ✗  | Misuse Company logos or trademarks. |

*For more information, review the Social Media Policy applicable in your country, available on the Portal or through your supervisor or Human Resources Business Partner.*
OUR COMMITMENT TO OUR COMMUNITIES

- CORPORATE CITIZENSHIP

We are committed to acting as a good corporate citizen in the communities where we operate. At TJX, we respect basic human rights and believe it is important to seek out suppliers and other third parties who do as well. As individuals, we are encouraged to give back to the communities where we live and work. However, if you choose to engage in a charitable cause, remember you should do so on your own time and expense. You should avoid giving the impression that because you support a cause personally, TJX supports it. When TJX does choose to support a particular cause or charitable organization, you are welcome, but not obligated, to participate.

- COMMERCE AND INTERNATIONAL TRADE

We comply with applicable requirements for the import and export of goods. When conducting business on behalf of TJX anywhere in the world, it is important to have a thorough understanding of local laws. Consult with our Logistics organizations for help complying with appropriate international trade regulations. Remember, we must also be accurate and truthful in representing business transactions to government agencies.

When engaging third parties to work on TJX’s behalf, make sure they are subjected to an appropriate approval process. Never select a service provider that you do not reasonably believe will make appropriate decisions on TJX’s behalf.

We are also committed to complying with applicable money-laundering laws throughout the world. In general terms, money laundering is the process of hiding the source of criminal proceeds and making those funds appear legal. Pay attention and report to your manager or the TJX Helpline activities that you suspect may be associated with money laundering, like using large amounts of cash, unusual transfers of funds to or from foreign countries, or providing false or incomplete information in connection with a payment.

- POLITICAL ACTIVITIES AND CONTRIBUTIONS

We do not use Company funds for political contributions. TJX does not make direct contributions of corporate funds to candidates or political parties. Use of Company funds or resources for political advocacy is to be limited and must be approved by our CEO, CFO or General Counsel in accordance with internal procedures. Any such advocacy is overseen by the Corporate Governance Committee of our Board of Directors.

We respect each other’s choices about political participation. TJX encourages Associates to be engaged in our communities and values the right and responsibility of Associates to participate as private citizens in political and governmental affairs. Any decisions about whether to be involved are personal and voluntary. You may not pressure or coerce another Associate to make an individual contribution to a political campaign. No Associate may take retaliatory action against an Associate for not making specific political contributions.

For more information, review the TJX Political Activity Policy Statement, available on the TJX website.
THE ENVIRONMENT

We are dedicated to protecting our environment and operating in a sustainable manner. TJX is committed to being an environmentally responsible corporate citizen and to complying with applicable environmental laws and regulations. Be sure to understand and follow required environmental rules and regulations that affect your job, including those related to the use and disposal of hazardous substances. We operate our business in a sustainable manner within the areas we believe are key, such as energy and waste management. We have created internal initiatives that conserve natural resources, create less operational waste, use less energy and are economically sound, and we are all encouraged to minimize environmental impacts associated with operational decisions.

NO INDIVIDUAL RIGHTS CREATED

The Code is not intended to confer any special rights or privileges upon any of us, or to provide greater or lesser rights than those provided by applicable law. In addition, it is not intended to entitle any of us to remain employed by TJX for any specific period or under specific terms or conditions. Employment at TJX is not for a definite time period and may be terminated at any time by the Company or by the Associate, for any reason or for no reason at all and with or without notice (unless doing so is for an unlawful reason, contrary to applicable law or to the terms of a written contract signed by an appropriate representative of TJX).

ADMINISTRATION OF THE CODE

The Code is not a contract. TJX retains the right to unilaterally modify the Code and Company policies at any time, without advance notice, to the extent permitted by applicable law.

Generally, TJX does not grant waivers or exceptions to the Code. Waivers of this Code for executive officers of TJX are only permitted when specifically approved by the Board of Directors and must be promptly disclosed to the Company’s shareholders, in accordance with applicable law, regulation or national exchange requirement. If you have questions or concerns about aspects of the Code, please contact your supervisor, local Legal or Compliance contact, the Chief Compliance Officer or the General Counsel to discuss your concerns. See the Getting Help & Raising Concerns section of the Code.
## CONTACTS & REPORTING

### TJX HELPLINE

<table>
<thead>
<tr>
<th>Region</th>
<th>Contact Information</th>
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<tbody>
<tr>
<td>North America</td>
<td>800-TJX-6488</td>
</tr>
<tr>
<td>U.K. &amp; Ireland</td>
<td>0800 328 1542</td>
</tr>
<tr>
<td>Other Locations</td>
<td>See below for local contacts</td>
</tr>
</tbody>
</table>

### INTERNAL CONTACTS

*When calling internationally, remember to dial your country’s exit code + destination country code + phone number.*

<table>
<thead>
<tr>
<th>Role</th>
<th>Contact Information</th>
</tr>
</thead>
<tbody>
<tr>
<td>Chief Compliance Officer</td>
<td>508-390-6570 <a href="mailto:complianceofficer@tjx.com">complianceofficer@tjx.com</a></td>
</tr>
<tr>
<td>Compliance Director</td>
<td>508-390-6510 <a href="mailto:asstcomplianceofficer@tjx.com">asstcomplianceofficer@tjx.com</a></td>
</tr>
<tr>
<td>Corporate Internal Audit Director</td>
<td>508-390-6540 <a href="mailto:corporateauditdirector@tjx.com">corporateauditdirector@tjx.com</a></td>
</tr>
<tr>
<td>Legal Department</td>
<td>508-390-6550 <a href="mailto:lawyer@tjx.com">lawyer@tjx.com</a></td>
</tr>
<tr>
<td>Privacy Group</td>
<td>508-390-2280 <a href="mailto:tjx_privacy_office@tjx.com">tjx_privacy_office@tjx.com</a></td>
</tr>
<tr>
<td>TJX Canada Local Contact</td>
<td>905-405-7530 <a href="mailto:winnerscomplianceofficer@winners.ca">winnerscomplianceofficer@winners.ca</a></td>
</tr>
<tr>
<td>U.K. &amp; Ireland Local Contact</td>
<td><a href="mailto:Legal_UK@tjxeurope.com">Legal_UK@tjxeurope.com</a></td>
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<tr>
<td>Germany Local Contact</td>
<td><a href="mailto:Legal_Germany@tjxeurope.com">Legal_Germany@tjxeurope.com</a></td>
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<td>Poland Local Contact</td>
<td><a href="mailto:Legal_Poland@tjxeurope.com">Legal_Poland@tjxeurope.com</a></td>
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<tr>
<td>Other Locations</td>
<td>Please contact your local compliance officer</td>
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