

Global Social Compliance

Corporate Responsibility / Responsible Sourcing / **Global Social Compliance**

Supporting Human Rights in Our Supply Chain through Global Social Compliance

SASB: CG-MR-410a.2

Our philosophy towards social compliance mirrors our culture, and just as we are committed to honesty, integrity, and treating others with dignity and respect, we expect those with whom we do business to do the same. Our Global Social Compliance Program is designed to convey and reinforce our expectations of respect for the human rights of workers in our supply chain through a variety of measures.



Vendor Code of Conduct

Our Vendor Code of Conduct



Factory Auditing

The factory auditing portion of our



Training

We conduct formal training sessions



Stakeholder Engagement

We engage with industry associations

serves as the foundation for our Global Social Compliance Program and reinforces our expectations on child and forced labor, ethical business standards, wages and benefits, environmental expectations, and more. Our purchase order terms and conditions include a requirement for merchandise vendors to comply with our Vendor Code of Conduct, including any factories or subcontractors they use.

Global Social Compliance Program has primarily focused on factories where we have more influence in bringing products to market. In recent years, we have expanded our factory auditing program where practical for our off-price business model.

biennially for TJX Associates involved in the buying and/or development of merchandise. In addition, we offer training sessions on a regular basis to buying agents, vendors, and factory management within our factory auditing program, typically in multiple locations around the world every year.

and various stakeholders on topics related to human rights and supply chain risk management as we believe this collaboration can help advance improvements in industry supply chain practices overall and also supports TJX's efforts. Learn more about our approach to stakeholder engagement and view a list of industry associations we participate in on our [Approach to Corporate Responsibility](#) page.

In addition to the program components outlined above, we are committed to providing stakeholders access to a grievance mechanism, The TJX Helpline. Our Associates, merchandise vendors, factory workers in our supply chain, and others can report suspected violations of our policies and standards through an online submission or via a dedicated phone line. The TJX Helpline is available 24/7 in 11 languages, and suspected violations and concerns can be reported anonymously. We publish information about the Helpline in a variety of places, including the [Vendor Code of Conduct](#), which is available below and on our vendor website, as well as our TJX Global Code of Conduct

for Associates. In addition, we expect our merchandise vendors to provide a fair and accessible grievance mechanism for their workers, as described in our Vendor Code of Conduct.

Factory Auditing

On a worldwide basis, in Fiscal 2025, we sourced merchandise from a universe of more than 21,000 vendors and more than 100 countries around the world. As an off-price retailer, the majority of the products we sell are high quality, fashionable, brand name, and designer merchandise, which we acquire through a wide array of opportunities, including department store cancellations, a manufacturer making up too much product, a closeout deal when a vendor wants to clear merchandise at the end of the season, and more. Sometimes when what we see in the marketplace is not the right value for our customers, meaning the right combination of brand, fashion, price, and quality, we also design or develop merchandise to be manufactured just for us.

FY25 Factory Audits

3,300+ Factories

As part of our Global Social Compliance Program, we regularly monitor a portion of our merchandise supply chain through our factory auditing program. The program is generally focused where we have more influence in bringing the products to market. We take this approach because it is where we believe we are most likely to have a meaningful impact.

Factories in our auditing program are required to undergo periodic audits to evaluate adherence to our Vendor Code of Conduct and local laws. In Fiscal 2025, we audited, or received audit reports from, more than 3,300 factories in almost 30 countries. Working hour violations, health and safety violations, and various benefits-related violations were among the most common violations identified.

We reviewed audits in Fiscal 2025 from factories in Bangladesh, Brazil, Cambodia, Canada, China, Colombia, Egypt, Hong Kong, India, Indonesia, Italy, Mauritius, Mexico, Morocco, Nepal, Netherlands, Pakistan, Peru, Philippines, Portugal, Singapore, South Korea, Sri Lanka, Taiwan, Thailand, Turkey, United Kingdom, United States, and Vietnam. The majority of these audits were conducted by auditors rated at the Registered Auditor (RA) or Certified Social Compliance Auditor

A world map with a light gray background and white country borders. Red flags are placed on the following countries: Canada (Quebec), USA (California), Mexico (Jalisco), Brazil (Rio de Janeiro), Argentina (Buenos Aires), Chile (Santiago), Spain (Madrid), France (Paris), Germany (Berlin), Italy (Rome), Greece (Athens), Turkey (Istanbul), India (New Delhi), China (Beijing), Japan (Tokyo), South Korea (Seoul), Taiwan (Taipei), Hong Kong, Singapore, Malaysia (Kuala Lumpur), Indonesia (Jakarta), Philippines (Manila), Thailand (Bangkok), Vietnam (Hanoi), Laos (Vientiane), Cambodia (Phnom Penh), Myanmar (Nay Pyi Taw), and Australia (Sydney).

Industry collaboration has resulted in increased numbers of factories that can provide us with recent audit reports from BSCI, WRAP, and SEDEX for our review. We believe this industry collaboration is beneficial as it can help reduce audit fatigue among factories, while helping companies obtain important information to evaluate their supply chain.

Together with our third-party representatives, we work closely with our buying agents and vendors within our factory auditing program so that they understand our Global Social Compliance Program, our Vendor Code of Conduct, and our factory auditing process. Our internal teams, including Social Compliance Associates in many of our global buying offices, also play an important role in educating these vendors on our expectations and encouraging vendors to make improvements at their facilities, when necessary.

We expect factories to cooperate fully with us and our auditors and to provide access to facilities and documents. Our TJX Global Social Compliance Manual 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 11 languages and offers detailed information designed to help agents, vendors, and factory management in our audit program better understand the expectations of our Vendor Code of Conduct, as well as our monitoring and remediation processes. In addition to providing this Manual to all new vendors in our factory monitoring program, we post the Manual to our vendor website, which is available to all vendors.

When third parties like UL, and Omega conduct audits on behalf of TJX, the audits generally include one to two full working days at each audited factory and cover the following components:

TJX FACTORY AUDITING PROCESS

INTERVIEWS WITH
FACTORY
MANAGEMENT



DOCUMENTATION
REVIEW
(POLICIES, PAYROLL, ETC.)



CONFIDENTIAL
WORKER
INTERVIEWS



FACTORY WALK-THROUGH

/ HEALTH & SAFETY INSPECTION
/ CHEMICAL & HAZARDOUS
MATERIALS REVIEW



DEBRIEF WITH
FACTORY
MANAGEMENT



RESULTS ASSESSMENT
AND RATING ASSIGNED



Our Assistant Vice President (AVP), Global Social Compliance, and designated Social Compliance Associates that support our program in buying offices around the world participate in shadow audits with auditors. Shadow audits are designed 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

Factory audit reports, whether an industry accepted report or a third-party audit conducted on behalf of TJX, are reviewed by TJX and assigned a rating of satisfactory, needs improvement, or unsatisfactory.



Satisfactory rating:

meets the minimum requirements of our Vendor Code of Conduct.



Needs improvement rating:

generally complies with most of our minimum requirements, with some lesser infractions identified.



Unsatisfactory rating:

more serious violations of our Vendor Code of Conduct have been identified.

When critical violations of our Vendor Code of Conduct are identified through our factory auditing program, we require our vendor to immediately terminate the use of that factory for any product manufactured for us. Critical violations of our Vendor Code of Conduct include violations such as bribery/corruption; child labor, forced or slave labor, and prison labor; human trafficking; maintaining a facility with all doors and/or exits locked; use of chemicals banned in the region; and failure to pay wages.

Factories with a Satisfactory rating are audited biennially while those with a Needs Improvement rating receive a corrective action plan (CAP) and are expected to remediate concerns within 180 days. Factories with an Unsatisfactory rating also receive a CAP and are expected to undergo a reaudit within 180 days. If a factory receives multiple successive Unsatisfactory ratings, it could face more serious consequences.

Encouraging Compliance with Environmental Laws

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 the factory's compliance with applicable environmental laws and regulations.

In addition, 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. Our social compliance training program covers the protection and conservation of water, as well as an overview of the legal requirements on the use of chemicals and hazardous materials.



Mitigating Our Impact

[Learn More](#)



Factory
Auditing

Social
Compliance
Training

Vendor
Code of
Conduct



Sustainable Sourcing

[Learn More](#)

Social Compliance Training

Providing training is an important way we reinforce our expectations to respect the rights of workers in our supply chain.

TJX Associates involved in the development and buying of merchandise are expected to undergo formal social compliance training biennially. These trainings are conducted by our AVP, Global Social Compliance.

The interactive training reviews the expectations set forth in our Vendor Code of Conduct along with examples of both good management practices and what violations may look like. The training also discusses our factory auditing program, including the process and ratings.

We also routinely train buying agents, vendors, and factory management within our factory auditing program, and we strongly encourage all new factories in our factory auditing program to participate in such training. Typically, we hold an average of 8-12 training sessions a year, focusing on various locations that are regionally close to factories included in our factory auditing program.

These training sessions are conducted by representatives from UL Solutions, one of our third-party auditors, in partnership with our AVP, Global Social Compliance. We believe the presence of our management at these sessions demonstrates to factory management, buying agent management, and vendors that TJX is committed to our Global Social

Compliance Program. Our training sessions have included the following topics:

- / TJX's Vendor Code of Conduct and the expectations contained in this Code
- / Local labor laws and anti-bribery laws (including the Foreign Corrupt Practices Act and the U.K. Bribery Act)
- / Regulations on chemicals and hazardous materials, Material Data Safety Sheets, hazardous waste management, and required environmental permits
- / Business ethics
- / TJX's policy against forced and involuntary labor, including slavery and human trafficking
- / Fire safety
- / Water conservation recommendations
- / TJX's fur practices
- / Factory compliance best practices
- / Case studies to help demonstrate how to embed management remediation systems
- / Open discussions with vendors and factory management on compliance challenges

Social Compliance Associates within our many global buying offices also provide instruction to vendors and factory management on our ethical sourcing expectations. We plan to continue to devote resources to these important training initiatives and to review and update these initiatives as appropriate.

Recently, we also began to offer additional forced labor training to merchandise vendors both within our factory auditing program and outside of the program through our participation in the Responsible Business Alliance's Responsible Labor Initiative.

Vendor Code of Conduct

We expect high ethical standards from anyone with whom we do business and are committed to respecting the rights of all workers involved in making products to be sold in our stores or on our e-

commerce sites. Our Vendor Code of Conduct aims to reflect our belief that the interests of those workers be protected and serves as the foundation of our Global Social Compliance Program, setting forth our standards, including human rights, labor rights, and ethical business standards, among other expectations.

TJX's purchase order terms and conditions include a requirement for merchandise vendors to adhere to our Vendor Code of Conduct. While the specific requirements contained in the Code were developed with merchandise vendors in mind, we expect all the companies and individuals with whom we do business to act with integrity and adhere to the basic principles that underlie each Code requirement. Those basic principles include a commitment to act in accordance with all applicable laws and regulations; respect the human rights and well-being of all people; and consider one's impact on the environment.

As with all our corporate responsibility programs, we are committed to continuous improvement. As the Code has evolved over the years, we have reviewed and taken inspiration from the United Nations Guiding Principles on Business and Human Rights and the International Labour Organization Declaration on Fundamental Principles and Rights at Work, as well as the results of benchmarking our Code against those of industry peers and feedback from other stakeholders. In recent years, we have made changes to our Code that provided more specificity around our expectations on important issues like child labor and forced labor, wages and benefits, freedom of association, and ethical business standards. We also made additional enhancements to our Code that focused on employee safety, among other things, and added grievance mechanism details, including a website and phone number for anyone wanting to report concerns. Our most recent review and update to our Code occurred in Fiscal 2026, and we plan to continue to evaluate further potential amendments we may want to make in the future.

We encourage anyone with questions or concerns relating to our Vendor Code of Conduct to contact us at complianceofficer@tjx.com.

The TJX Companies, Inc. 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 & Regulations

Our vendors and the factories in which the merchandise they sell us is manufactured must comply with all applicable laws and regulations,

including, but not limited to, labor, environmental, and animal protection laws.

Ethical Business Standards

Our vendors must not engage in or attempt to engage in bribery, corruption, or similar unethical business practices in dealing with government officials or private individuals or entities. This includes, but is not limited to, avoiding all situations where they may have or appear to have a conflict of interest and prohibits offering gifts, entertainment, or anything else of value with the intent to gain a favorable business advantage.

Health & Safety

Our vendors must provide their workers with safe and healthy conditions, including in any living facilities that may be provided. Our vendors must provide access to clean and sanitary facilities, including, but not limited to, clean drinking water.

Fire Safety

Our vendors must abide by all applicable laws and regulations related to fire safety. All appropriate measures must be in place to safeguard the health and safety of workers in the event of a fire, including, but not limited to, regular emergency evacuation drills and unobstructed and detectable emergency alarms.

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). At all times our vendors must respect compulsory education laws. Workers under the age of 18 must not perform hazardous work.

Forced Labor

Our vendors must not use voluntary or involuntary prison labor, indentured labor, bonded labor, labor acquired through slavery or human trafficking, or any forms of involuntary or forced labor. All work must be voluntary, and workers must be free to terminate their employment. Workers must have freedom of movement in both the workplace and living facilities. Our vendors must not require workers to surrender any identity papers as a condition of employment; such documents may only be temporarily held to verify a worker's employment eligibility. Our

vendors must reimburse their workers for any recruitment or hiring fees that are paid.

Wages & Benefits

Our vendors must abide by all applicable laws relating to wages and benefits and must pay the legally prescribed minimum wage or higher. Workers must be provided with a written contract in a language they understand which clearly describes their employment and wage terms prior to acceptance of employment. Our vendors must not make any deductions from wages as a disciplinary measure.

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. Our vendors must comply with applicable laws regarding vacation time, leave period, and holidays.

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, religious, ethnic or cultural beliefs, age, sexual orientation, pregnancy, marital or parental status, or any other prohibited basis. Non-work-related health testing, such as pregnancy or HIV, must not be used as a condition of employment. Migrant foreign workers should be treated fairly and on an equal basis with local workers.

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. We prohibit harassment, retaliation, and violence against trade union members and representatives.

Environment

Our vendors must be in compliance with all applicable environmental laws and regulations, including maintaining current environmental permits. Our vendors must be in compliance with all laws related to the handling, storage, and disposal of chemicals and other hazardous materials. Our vendors must adopt reasonable practices, where possible, to conserve and protect resources, such as water and energy; and mitigate negative environmental impacts to 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 & Compliance

TJX or its designated third-party auditor or agent shall have the right to monitor and assess compliance with the principles described in this Code of Conduct. Our vendors must be transparent and honest in all communications with TJX, our auditors, and agents. 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.

Management Systems

Our vendors must implement management systems that facilitate compliance with this Code of Conduct and any applicable laws and regulations, and that identify and mitigate risks relating to this Code of Conduct, including knowing your suppliers, subcontractors, and factories and monitoring their performance with a focus on continuous improvement.

Grievance Mechanism

Our vendors must provide a fair and accessible method for workers to raise concerns to management without fear of retaliation.

Reporting to TJX

Violations of this Code of Conduct can be reported through the **TJX Helpline at [TJXethicsline.ethicspoint.com](https://www.tjxethicsline.ethicspoint.com)** or by calling (US #) **800-TJX-6488 (800-859-6488)**.

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