



## MODERN SLAVERY STATEMENT

This Statement relates to our fiscal year that commenced on January 29, 2023 and ended February 3, 2024 (“fiscal year 2024”). This Statement generally discusses the efforts of The TJX Companies, Inc. and our consolidated subsidiaries (“TJX” or “we” or “our”) to address the risks of forced labor, human trafficking, slavery, and child labor (collectively referred to herein as “modern slavery”) in our operations and supply chains. We have prepared this Statement on a consolidated basis for TJX because we have common policies and take a global approach to compliance programs relating to modern slavery.

This Statement is being published pursuant to the California Transparency in Supply Chains Act, U.K. Modern Slavery Act, Australian Commonwealth Modern Slavery Act, and Canadian Fighting Against Forced Labour and Child Labour in Supply Chains Act. However, not all of our group companies are subject to these Acts. To the extent applicable, the signature pages to this Statement include additional disclosures specific to the entities required to prepare a statement under one or more of the laws listed above in this paragraph and the dates this Statement was signed and/or approved.

**About Our Business.** TJX is an off-price retailer of apparel and home fashions with over 4,900 stores across three continents in nine countries offering a rapidly changing assortment of merchandise. We source merchandise from a varying and expansive universe of over 21,000 vendors and more than 100 countries. As a multi-banner, multi-geography off-price retailer, we have a large, complex, and global business model that differs from many other traditional retailers. TJX does not own, operate, or control the facilities that manufacture products sold in our stores and does not replenish specific branded products purchased from a small or generally consistent vendor base. Our strategies to acquire merchandise are intentionally flexible to allow our buying organization to react to frequently changing opportunities and trends in the market and to adjust how and what is acquired as well as when it is acquired. 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 may help design or develop merchandise to be manufactured just for us.

**Our Commitment.** At TJX, we are committed to treating people with dignity, fairness, and respect. TJX expects all companies and individuals we do business with to act with integrity and to comply with all applicable laws and regulations, and respect human rights and the well-being of all people. TJX is committed to responsible business practices; we regularly review our policies and set ethical standards for ourselves and those we work with.

TJX has global vendor-facing human rights compliance policies and procedures. To promote respect for human rights within our own operations, TJX has a combination of globally applicable and locally tailored policies and procedures.

**Our Global Social Compliance Program.** TJX’s global social compliance program has taken inspiration from, among other things, the United Nations Guiding Principles on Business and Human Rights and standards set by the International Labour Organization. Our program includes, among other things, our factory auditing program, our Vendor Code of Conduct, our training and other preventative measures, and our grievance mechanisms.

### *Policies*

TJX maintains a [Global Code of Conduct](#) for our own Associates and a [Vendor Code of Conduct](#) for our merchandise vendors. Collectively, these documents define the human rights expectations placed by TJX on our Associates and suppliers in the supply chain.

Our Global Code of Conduct prohibits behavior that creates an intimidating or hostile work environment, and it requires TJX Associates to obey all applicable laws and regulations of the countries in which we operate, including wage and hour rules. In choosing third parties to work with, our Associates are also expected to select those that act with integrity and in a manner consistent with the ethical principles stated in our Global Code of Conduct. Corrective action for violations of the Global Code of Conduct or other TJX policies will vary and will depend on the nature and severity of the violation, as well as any applicable local regulations. Corrective action could include corrective discipline, up to and including termination of employment.

TJX’s Vendor Code of Conduct serves as the foundation for our Global Social Compliance Program, incorporating human rights, labor rights, and anti-corruption standards, among other expectations. Our Vendor Code of Conduct prohibits involuntary or forced labor, prison labor, as well as child labor. Our Vendor Code of Conduct further requires that the goods our merchandise vendors sell be manufactured in accordance with all applicable laws and regulations, which include those pertaining to modern slavery. TJX’s purchase order terms and conditions include a requirement for merchandise vendors to adhere to our Vendor Code of Conduct and require that any factories or subcontractors they use also comply with TJX’s Vendor Code of Conduct.

### *Governance*

Our Global Social Compliance Committee brings together subject matter experts and senior leadership from across the globe and across different functions to collaborate, monitor key issues and trends, review strategies and best practices, and help guide the strategy and execution of the program. In addition to our Global Social Compliance Committee, our Chief Risk and Compliance Officer, who is a member of our Global Social Compliance Committee, provides an annual update to our Board of Directors on our Global Social Compliance Program and meets regularly with our Board and the Audit and Finance Committee of the Board.

### *Risk Assessment*

To help us evaluate and address the risks of modern slavery in our merchandise supply chain, we utilize both proprietary and public domain data to identify known and suspected risks. Examples of these resources and the data taken into account include:

- Membership in external multi-stakeholder initiatives that share resources and best practices to improve efforts to combat forced labor, including the Joint AAFA/NRF/RILA/USFIA Forced Labor Working Group, the Responsible Business Alliance’s Responsible Labor

Initiative, the Retail Industry Leaders Association Responsible Sourcing Committee, and the American Apparel and Footwear Association Social Responsibility Committee.

- The List of Goods Produced by Child Labor or Forced Labor as reported by the United States Department of Labor to help identify high-risk production countries.
- List of countries identified by the 2023 ITUC Global Rights Index as being of higher risk for worker right violations.
- The results of audit reports received for those merchandise vendors who are part of TJX's factory auditing program.
- Annual meetings with TJX's third-party audit service providers to stay abreast of emerging areas of human rights-related risks. TJX's third-party audit firms also provide regular country and industry updates related to relevant risks.
- Industry and press reports concerning merchandise product categories that may be a higher risk for forced labor.
- Complaints received through the TJX Helpline or other mechanisms.
- The locations of suppliers and associated geographical risks.

We believe that—like most other retailers—the principal modern slavery risk is that forced or child labor could occur without our knowledge in violation of our policies in areas of the supply chain where there is inherently limited visibility. We are aware of reports of modern slavery in apparel supply chains generally and, as described below, our Global Social Compliance Program underscores our efforts to address and mitigate these risks and, where appropriate, take corrective action. We believe that the risk of modern slavery in our own workforce is minimal due to the strength of our internal employment policies and procedures.

### *Factory Audits*

TJX's Global Social Compliance Program includes a factory auditing program which focuses on those products we have more influence in bringing to market. This means the auditing program typically reaches factories that produce merchandise that TJX has helped to design or develop just for us. Factories included in TJX's audit program are required to undergo audits in connection with onboarding and regularly scheduled audits thereafter. TJX contracts with leading independent auditors and other third parties to conduct these social compliance audits and also accepts audit reports from recognized audit sources. These social compliance audits evaluate potential human rights and environment-related risks. In fiscal 2024, we audited, or received audit reports from, more than 3,100 factories in about 30 countries. Over the last two decades, we have conducted or accepted tens of thousands of audits.

- For factories included in TJX's factory auditing program, TJX aims to conduct pre-source audits (i.e. audits that take place before any goods are made for TJX). If a critical violation of TJX's Vendor Code of Conduct were found during the audit, TJX would not order goods from that factory.
- As part of the factory auditing program, factories receive an audit score of Satisfactory, Needs Improvement, or Unsatisfactory. Factories with a score of "Needs Improvement" receive a Corrective Action Plan ("CAP") and are expected to show proof of remediation within 180 days. Factories that receive an Unsatisfactory rating are those that have more serious infractions of the Vendor Code of Conduct. These factories also receive a CAP and are expected to undergo a reaudit within 180 days. If a factory receives a certain amount

of successive Unsatisfactory ratings there could be more serious consequences, up to and possibly including notification to the vendor that this factory may no longer be used in the production of goods manufactured for TJX.

Though TJX strives to work with vendors to address and resolve shortcomings in their operations, if critical violations of TJX's Vendor Code of Conduct occur, such as severe human rights violations, bribery, failure to pay wages, and other significant issues, TJX may conclude that its merchandise can no longer be produced in certain factories, or that those factories will be prohibited from producing goods for TJX until they demonstrate that they have addressed the situation and have put management systems in place to prevent a recurrence.

TJX also provides its vendors with TJX's Global Social Compliance Manual—available in eight different languages—which contains, among other guidance, an audit procedure outline and factory evaluation checklist to help prepare factories for the audit process. TJX has Compliance Program Guidelines for Factory Auditing to guide its internal personnel and third-party audit firms used by TJX. The audits are conducted on an unannounced basis during specified time windows, where practical, and they are intended to verify the factory's compliance with the standards contained in our Vendor Code of Conduct, including our prohibition of involuntary or forced labor and child labor. To this end, factory audits consider, among other things, whether workers are responsible for any fees associated with their recruitment and evaluate policies related to passport retention. Vendors are expected to cooperate fully with the audits and to provide the auditors with full access to their facilities, employees, and documentation. Factory audits include employee interviews to hear first-hand about worker treatment.

### *Training*

As appropriate for their roles, TJX Associates are regularly trained on policies and TJX expectations. Associates involved in the development and buying of merchandise are expected to undergo formal social compliance training biennially. This training includes TJX's prohibition on the use of forced labor, child labor, and prison labor.

TJX also conducts regular training sessions for buying agents, vendors, and direct supplier factory management. The trainings cover topics aimed at risk-prevention, including TJX's policy expressly prohibiting the use of any forced labor, child labor, and prison labor. Among other things, this training provides guidance on recognizing and mitigating the risks of modern slavery. Typically, we hold an average of 8-12 training sessions a year, focusing on various locations around the world that are regionally close to factories included in our factory audit program.

Through TJX's affiliation with the Responsible Business Alliance, TJX also offers its vendors access to virtual Forced Labor Prevention for Factories training. Vendors and the factories they use in the production of TJX goods are encouraged to self-register for this training through TJX's corporate intranet site for vendors.

### *Contractual Terms*

As described above, the terms of the Vendor Code of Conduct are incorporated into TJX's merchandise purchase orders and require merchandise vendors to agree that they will not, nor will parties providing goods or services in support of the order, engage in, voluntary or involuntary, prison labor, indentured labor, bonded labor, labor acquired through slavery or

human trafficking, any forms of involuntary or forced labor offenses, or child labor.

### *Grievance Mechanisms*

TJX Associates are encouraged to raise any concerns without fear of retaliation and have multiple channels to do so, including an ethics hotline staffed by independent third-party operators, which is operated 24/7 and allows for anonymous complaints as permitted by local law. External stakeholders, including vendor personnel, may reach us via this ethics hotline or any of the phone numbers or addresses listed by locality on the "Contact Us" section of our corporate website. We also have a "Reporting" section in our Vendor Code of Conduct, which includes a link to our ethics hotline reporting website and phone number, further enabling vendors to report any potential violations or concerns to us.

### **Assessing the Effectiveness of Our Actions**

To assess the effectiveness of the programs we have in place to ensure that modern slavery is not being used in our supply chain, TJX reviews the results of our factory audits, the implementation of any required CAPs, and the number and type of complaints received through the ethics hotline and other internal reporting mechanisms.

### **For More Information**

While an overview of our efforts is provided here in response to the Acts noted at the beginning of this Statement, we invite you to explore a more comprehensive description of our Global Social Compliance Program within the Corporate Responsibility section of our website at <https://www.tjx.com/corporate-responsibility/responsible-business/global-social-compliance>.

*Canadian Fighting Against Forced Labour and Child Labour in Supply Chains Act*

Winners Merchants International LP (“Winners”) is required to submit a report pursuant to the Canadian Fighting Against Forced Labour and Child Labour in Supply Chains Act (the “Canadian Act”). Winners comes within TJX’s Global Social Compliance Program, which is discussed throughout this Statement. Winners is an indirect wholly-owned subsidiary of The TJX Companies, Inc.

Winners operates our Marshalls, Winners, and Homesense retail stores. As of the end of fiscal year 2024, Winners had approximately 36,700 employees.


TJX’s, including Winners’, supply chain is discussed earlier in this Statement. The risks of forced and child labor applicable to Winners mirror that of TJX and are discussed earlier in this Statement.

During fiscal year 2024, TJX did not identify any instances of modern slavery that necessitated remediation nor is TJX aware of vulnerable families experiencing a loss of income as a result of steps TJX has taken to mitigate the risk of modern slavery.

Solely for purposes of compliance with the Canadian Act, in accordance with section 11(4)(b)(i), this Statement has been approved by the Board of Directors of WMI-1 Holding Company, the general partner of Winners, for the fiscal year 2024.

In accordance with the requirements of the Canadian Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the Statement for the entity listed above. Based on my knowledge, and having exercised reasonable diligence, I attest within my capacity as an officer of WMI-1 Holding Company, duly authorized to carry on the duties of Vice President of Winners for purposes of carrying on the business of Winners, that the information in the Statement is true, accurate, and complete in all material respects for the purposes of the Canadian Act, for the reporting year listed above.

Winners Merchants International LP,  
by its General Partner  
WMI-1 Holding Company

By:   
Name: David L. Averill  
Title: Vice President