



GLOBAL CODE OF CONDUCT



OUR VALUES ARE ALWAYS IN STYLE

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A MESSAGE FROM OUR CEO AND OUR CHAIRMAN

At TJX, honesty and integrity have been at the heart of our culture since our Company's inception. We are a company of values—deeply committed to valuing our global Associates, providing value to our customers, and adding value to the communities in which we operate.

We believe that TJX is a great place to work, and how we conduct ourselves in the workplace matters. We count on each Associate to embody our long-held principles of integrity, ethics, fairness, and caring for one another. We greatly appreciate and value the importance of having an inclusive and diverse workforce and want every TJX Associate to feel welcome in our Company, valued for their contributions, and engaged with our business mission. In every area of our business, we strive to lead by example to help create a workplace that fosters open and honest communication and encourages different perspectives, ideas, and opinions.

The TJX Global Code of Conduct (“Code”) illustrates how, individually and as an organization, we are expected to uphold the Company's values. Our pursuit of the highest standards of integrity and business ethics has always been a cornerstone of our success, and we are committed to continuing that effort.

We expect you to read, understand, and comply with the Code, and to report any violations. If you have read the Code in the past, please do so again, as it has been updated. We are all expected to know and comply with the Code and any other policies that relate to our specific job function. If you have any questions or concerns about our expectations, we encourage you to seek answers from the many resources provided throughout the Code.

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

Sincerely,



Ernie Herrman
Chief Executive Officer & President



Carol Meyrowitz
Executive Chairman of the Board

OUR COMMITMENT



TJX—including all of its divisions and subsidiaries worldwide—is committed to conducting business in compliance with applicable laws, rules, regulations, and Company policies. We expect Associates throughout our global operations to act with honesty and integrity and to treat others with dignity and respect.

We all must read and follow this Code in its entirety as well as any applicable Company policies. This Code and the policies that are referenced in it are generally available in our Stores and Distribution Centers or through our Company intranet (The Thread), your manager or Human Resources. In some jurisdictions, Company policies are also available through a Company-sponsored third-party application. Some departments and positions also have specific policies that apply to them. It is your responsibility to review and understand any policies that apply to you and ask questions as needed.

The Code serves as our guide for ethical business conduct. It includes a variety of important topics and additional resources to help each of us work through ethical issues that may arise. Several key principles form the foundation for the guidance in this Code, and you should always keep them in mind:

- / **Act ethically and with integrity.** Ethics and integrity are essential parts of your job; you are accountable for your actions.
- / **Promptly report** any activity you think may violate the Code, Company policies, or the law—never ignore, investigate on your own, or cover up a possible violation.
- / **Cooperate with any Company investigation,** including those related to the Code, Company policies, or the law.
- / **Never 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 or proceeding.
- / **Ask questions** you have about the Code or Company policies.

THE CODE APPLIES TO ALL OF US



This Code applies to all TJX Associates, worldwide, and at every level. No one is exempt from following our Global Code of Conduct. Our Board of Directors is also subject to this Code.

GLOBAL OPERATIONS

TJX is a global business that operates under many different laws and within many different customs and cultures. Regardless of where we do business, we must follow the high standards of our Code at all times.

We obey applicable laws and regulations of the locations in which we operate. To the extent any statements in this Code conflict with the requirements of local or applicable law, you should follow the law.

THIRD PARTIES

TJX expects all of the third parties and vendors we work with to comply with the law and to act with integrity and in a manner consistent with the high ethical standards embodied in this Code.

If you work with third parties, select a company or person that has a reputation for integrity, and acts in a responsible manner consistent with our standards. It is up to you to manage effectively any third parties with which you work and to report any questions or concerns to your manager, HRBP, or the Helpline right away.

SUPERVISORS, MANAGERS, AND EXECUTIVES

Our culture of integrity and compliance starts at the top. All members of management assume responsibility for those who report to them. If you are a supervisor, manager, or executive, it is your job to:

- / Do the right thing—lead by example and create an environment of integrity that supports doing the right thing.
- / Be available when Associates have questions or concerns.
- / Respond appropriately when an Associate brings a potential problem to you.
- / Escalate to appropriate persons when needed.
- / Never retaliate or tolerate retaliation by others.

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 contrary to applicable law, for an unlawful reason, or contrary to the terms of a written contract signed by an appropriate representative of TJX).

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

WAIVERS OF THE CODE

TJX does not generally grant waivers or exceptions to the Code. Waivers of this Code for executive officers or Directors of TJX may only be approved by the Board of Directors or a Committee of the Board and must be promptly disclosed in accordance with applicable law and regulation.

GETTING HELP & RAISING CONCERNS



At TJX, we believe we should all be treated fairly and have the opportunity to speak openly. Our Open Door philosophy is intended to support this core belief in honest, respectful communications. Protecting TJX's culture of honesty and integrity is all of our responsibility. Raising concerns and reporting potential violations of the Code helps maintain our culture.

WHO TO CONTACT

- / Contact a manager or Human Resources
- / Contact the TJX Chief Compliance Officer in the U.S.
 - complianceofficer@tjx.com or call 508-390-6570
- / Contact local compliance contacts
 - Canada: winnerscomplianceofficer@winners.ca
 - Europe: tjxeurope_compliance@tjxeurope.com
- / Visit the TJX Helpline* at TJXethicsline.ethicspoint.com or call:

North America: 800-TJX-6488	Ireland: 1800812917
Australia: 1800743908	Italy: 800902431
Austria: 08000706289	Netherlands: 08002929220
Germany: 08007243508	Poland: 800707143
France: 080090-8900	United Kingdom: 08000850336
Hong Kong: 800-96-0234	Vietnam: 1-202-022 (then 800-859-6488) or 1-228-0288 (then 800-859-6488)
India: 8444981266 (Access Code: 000-117)	

* The TJX Helpline is available 24 hours a day, 7 days a week. It is managed by an independent third party and is available in most local languages. Reports can be made anonymously unless doing so is prohibited by local law or regulation.

Additional contacts on page 30.

No Retaliation

It's important that we all feel safe and comfortable speaking up about our concerns. You have the option to remain anonymous when calling the TJX Helpline unless doing so is prohibited by local law or regulation. TJX will not tolerate any form of retaliation or victimization for making good-faith reports (reports that are true and complete to the best of your knowledge) or for participating in an investigation or proceeding relating to a complaint. Anyone who retaliates or attempts to retaliate will be subject to corrective action in accordance with Company policies and applicable law.

What to Expect When Reporting

TJX will promptly look into all reported concerns with appropriate attention to confidentiality and take action when warranted. Corrective action for violations of this Code or Company 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. Some violations may also be reported to criminal or civil authorities, as required or appropriate. All of the above is subject to applicable law.

Cooperating with Company Investigations

All of us are expected to cooperate with any Company investigation including those related to the Code, Company policies, or the law. Anyone who knowingly makes a false allegation or is uncooperative or untruthful during an investigation will be subject to corrective action in accordance with Company policies and applicable law.

OUR COMMITMENT TO OUR ASSOCIATES



INCLUSION & DIVERSITY

We promote inclusion and value the diversity of our fellow Associates. As a global company serving customers in many countries across several continents, we greatly appreciate and value the importance of having an inclusive culture and diverse workforce. We want every TJX Associate to feel welcome in our Company, valued for their contributions, and engaged with our business mission.

We all must stay mindful and committed to fostering an environment of inclusion and promoting workplace diversity at TJX. We believe that creating an inclusive environment in which Associates are engaged and empowered strengthens our business and supports a culture where Associates are inspired to work hard, challenge themselves, and be innovative in their thinking. We consider the unique backgrounds, experiences, and identities of our fellow Associates to be key drivers of our future growth and success.

DISCRIMINATION-FREE WORKPLACE

We treat each other with honesty, dignity, and respect. At TJX, we recognize that our Associates bring a unique set of abilities and perspectives. TJX does not permit unlawful discrimination of any kind.

It is against TJX policy to discriminate based on a legally protected status, such as an individual's race, color, religion, sex, age, national origin, ancestry, sexual orientation, disability, medical condition, genetic information, protected leave status, gender, gender identity or expression, pregnancy, marital or parental status, military or veteran status, political beliefs, or any other status protected under applicable law.

We are committed to providing equal employment opportunity and equal access to workplace benefits to qualified individuals with disabilities. TJX strives to provide reasonable accommodations to enable qualified individuals with disabilities to access employment opportunities and perform the essential functions of their positions consistent with applicable laws.

HARASSMENT-FREE WORKPLACE

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 may be considered harassment, as defined by applicable local law.

Harassment may include any verbal or physical conduct based on an individual's protected status that unreasonably interferes with their work performance or creates an intimidating, hostile, abusive, or otherwise offensive environment. Harassment can take many forms, but regardless of the form it takes, or where it occurs, it is not tolerated.

Harassment may include:

- / Remarks, slurs, or jokes that are demeaning or offensive based on a legally protected status.
- / Sexual advances, requests for sexual favors, or other written, verbal, or physical conduct of a sexual or otherwise inappropriate nature.
- / Emails, texts, instant messages, social media posts, or other communications that are demeaning or offensive based on a legally protected status.

No one at TJX may base business or employment decisions on requests for sexual favors, submission to or rejection of sexual advances, or other verbal or physical conduct of a sexual nature.

Talk to a manager or Human Resources, or contact the TJX Helpline if you have any concerns. If you are a supervisor, manager, or executive, and hear an allegation of harassing behavior, you must promptly notify Human Resources.

For more information, review your local Harassment, Discrimination, Bullying, and/or Equal Opportunities Policies.

ASSOCIATE WAGE AND HOUR RULES

We follow all applicable wage and hour laws and regulations. It is very important that all Associates are paid properly for their work. If you are an Associate paid by the hour (known as “Non-Exempt” in the U.S.), you must always record any time worked accurately and honestly and take meal periods and rest breaks in accordance with applicable TJX policies. Working without compensation (sometimes referred to as working “off the clock”) or working during meal and rest breaks—as well as directing or permitting someone to do so—is against TJX policy. Outside of the U.S., similar or other restrictions may apply to other associates under applicable law.

Compliance with wage and hour laws is a priority at TJX and proper punches are important for accurate timekeeping.

Do not:

- / Falsify time records, for example, to either increase or decrease your work time or the work time of others.
- / Punch in or out for another Associate or ask another Associate to punch in or out for you in violation of the Company’s time-keeping policies.
- / Work without compensation (off the clock) or ask someone else to do so.
- / Skip or interrupt meal and/or rest periods required by TJX policy or applicable law.

If you are eligible for overtime pay, you are required to have any overtime work or additional work authorized by a supervisor or manager. Of course, you must record all time worked and may not work more than the maximum number of hours permitted by law.

If you are responsible for recording or supervising timekeeping for others, you must make sure that Company payroll practices and requirements related to accurate timekeeping, minimum wage, overtime pay, timely payment of wages, termination/final pay, and employment, hours, and payment of minors are followed.

We expressly prohibit the use of unlawful child labor and forced or involuntary labor anywhere within our own operations.

Talk to a manager or Human Resources, or contact the TJX Helpline if you have any concerns.

HEALTH AND SAFETY

We follow safety policies and procedures to protect and preserve the well-being of our Associates and customers. 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 and our stores.

You can help keep the workplace safe by taking the following actions:

- / **Be alert.** Keep your eye out for any potential hazard you can reasonably and safely 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.
- / **Be prepared.** Learn the safety and emergency procedures for your workplace, available on The Thread or in your location's emergency response procedures. If you have questions, ask your manager for help.
- / **Report potential hazards.** If you cannot correct a potential hazard yourself, no matter how minor, report it to your immediate supervisor or manager right away. If the situation is not addressed, contact your division's Risk Management Department or Health & Safety Department.
- / **Seek medical attention.** Request immediate medical attention for an injured or seriously ill person.
- / **Report injuries immediately.** Report any accident or injury, no matter how minor, to your immediate supervisor or manager.

DRUG & ALCOHOL-FREE WORKPLACE

We do not tolerate or engage in improper substance use in the workplace. Not only does improper substance use violate Company policy and often the law, but it can also pose a threat to safety.

- / **Do not work under the influence.** Do not report to work, come onto Company property, drive a Company vehicle, or perform any job-related activity while under the influence of or impaired by alcohol, marijuana (including recreational and medical marijuana), or illegal drugs. Keep in mind, even when using legally prescribed or over-the-counter medications, you are expected to use good judgment and perform your job in a safe and responsible manner at all times.
- / **Follow the law.** Engaging in any illegal activity involving alcohol or drugs while working on the Company's behalf or on Company premises is prohibited.
- / **Act professionally.** In limited situations, alcohol may be available at certain approved Company events. If you choose to drink at any Company-sponsored event where alcohol is present, do so legally, responsibly, and only in moderation.

VIOLENCE-FREE 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 or that otherwise impact the workplace. You must not engage in violent behavior, threaten violence, or engage in verbal abuse, harassment, stalking, or intimidation.

- / **No weapons.** TJX prohibits Associates from having weapons on Company property to the fullest extent allowed by law.
- / **Report violence, threats, and weapons.** You should immediately report violence, threats of violence, and weapons brought onto Company property to your manager or your Loss Prevention Department.

Talk to a manager or Human Resources, or contact the TJX Helpline if you have any concerns.

OUR COMMITMENT TO OUR CUSTOMERS AND OUR BUSINESS VALUES



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 with dignity and respect and provide all customers with the highest quality service at all times.

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. We aspire to cultivate a welcoming and inclusive environment that embraces diversity. We should never harass or discriminate against our customers or others with whom we do business under any circumstances.

PRODUCT SAFETY

We sell safe, properly labeled merchandise. We expect and require that our vendors provide us with safe, compliant 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 are concerned that any merchandise has been recalled or is potentially unsafe or mislabeled, inform the TJX Product Compliance/Risk Department and your immediate supervisor, a manager, or your local Risk Management Department right away.

HONEST ADVERTISING

We advertise honestly. We must always be accurate and fair in what we say when discussing TJX merchandise and services. Do not say anything untrue, unfounded, or misleading about our merchandise or services or about our competitors' or other companies' merchandise or services. If you are responsible for establishing comparison prices, make sure that you follow all applicable policies or procedures in your division.

Talk to a manager or Human Resources, or contact the TJX Helpline if you have any concerns.

HONEST BUSINESS PRACTICES

We do not engage in dishonest business practices. Acting ethically and with integrity is an essential part of every Associate's job and requires that you be honest in dealings with customers, third parties, and other Associates.

Dishonest business practices can include:

- / Making false or intentionally misleading statements.
- / Omitting information (or presenting incomplete information) in a way that is meant to mislead or misstate.
- / Falsifying Company records (including payroll and timekeeping records, purchase orders, or other records).
- / Theft or fraud.
- / Financial wrongdoing of any kind.

Always be honest and truthful when performing your duties for TJX.

Talk to a manager or Human Resources, or contact the TJX Helpline if you have any concerns.

FAIR DEALING & 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:

- / **No anti-competitive agreements.** Do not enter into any agreement (whether formal or informal, directly or indirectly) with our suppliers, vendors, or other third parties, including competitors, to restrain trade. Examples of 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 conversations about anti-competitive behavior.** Avoid discussions with our suppliers, vendors, or other third parties including competitors about these topics. This applies even if the other party suggests it or if it comes up at a trade event.

Global competition laws, including antitrust laws in the United States, are complex, and the consequences of violating them can be serious for the individuals involved and for TJX. It is important to be familiar with the laws applicable to your role and keep them in mind while you do your job.

For more information, read TJX's Global Antitrust Policy.

We do not engage in unfair or fraudulent business practices. We never use unfair or deceptive 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). Offering or accepting bribes, kickbacks, or other improper payments, gifts, or entertainment to obtain or retain business opportunities or to take away business from a competitor is never acceptable.

We do not use others' information without permission. We respect the confidentiality of other companies' business information. TJX Associates may never misuse confidential information or trade secrets of others, including that learned at previous employers. This means:

- / Do not attempt to learn or use competitors' trade secrets or improperly obtain confidential information about or from other companies.
- / Do not bring documents containing trade secrets or confidential information from previous employers or use such information at TJX.
- / Respect the obligations other Associates may have to maintain the confidentiality of information of former employers.

Talk to a manager or Human Resources, or contact the TJX Helpline if you have any concerns.

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. We comply with valid governmental requests and demands for information. This means:

- / If you are contacted by a government or regulatory representative and asked to provide information or to submit to an inspection, **inform your supervisor or manager immediately.** Your supervisor or 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.
- / 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, but still contact your supervisor, a member of management, or the Legal Department.

Talk to a manager or Human Resources, or contact the TJX Helpline if you have any concerns.

CONFLICTS OF INTEREST

We avoid situations that create, or appear to create, a conflict of interest. Conflicts of interest arise 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, compromised. They 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.

Best interests of the Company. You should always perform your duties for TJX with only the interests of the Company in mind—not for personal gain or other personal reasons. This means being aware of, and avoiding, potential conflicts created by our own activities, investments, and relationships and those of others close to us as well. Conflicts of interest can also be created by the activities, investments, and relationships of our family members, for example, by our spouses, children, stepchildren, parents, stepparents, in-laws, grandparents, siblings, others who live in our households, or by someone else who is close to you.

Some 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.
- / Operating certain “side hustles” such as some retail consulting services, online shops, or social media activity for profit.
- / Offering or receiving special consideration or gifts (other than in a manner consistent with the **TJX Gifts and Entertainment Policy** and any department or division standards).
- / 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 your home for non-business use or in a manner inconsistent with any division sample guidelines.
- / Purchasing merchandise from TJX to resell.
- / Misusing Company systems, like the markdown process, for your own or anyone else's benefit.

Personal relationships. Personal relationships at work can create, or appear to create, conflicts of interest.

Associates in a personal relationship 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 particular, subject to applicable law:

- / You may not directly or indirectly supervise (including review or influence the employment status or position, performance evaluation, compensation, or benefits of), report to, or occupy a position in the same chain of command as any individual with whom you have a romantic or intimate relationship.
- / You may not directly supervise or report to a relative or co-habitant. Associates hired after the 2020 publication of this Code also may not occupy a position in the same chain of command as a relative or co-habitant.

Many conflicts of interest related to personal relationships can be addressed if they are brought to the Company's attention. The Company retains the discretion to determine on a case-by-case basis whether a particular situation presents a conflict of interest. **Both Associates have an obligation to contact a member of Human Resources or our Chief Compliance Officer** whenever a personal relationship may present a conflict of interest so the Company can consider how to address any conflict.

Refer to the TJX Global Conflict of Interest Policy and your division's Employing Relatives/Co-Habitants Policy for additional information.

We avoid financial conflicts of interest. Personal financial activities also 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 personal 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, landlord, or a competitor (other than certain small investments as detailed in the **TJX Global Conflict of Interest Policy**).
- / You receive compensation or consideration for commenting on our products, stores, or industry without TJX's approval.
- / You receive compensation or consideration from anyone other than TJX for doing your job for TJX.

We do not take Company property or opportunities for personal gain. Never use Company property or information or your position at TJX for personal gain. Remember that business opportunities you discover through work at TJX belong to TJX. Do not take for yourself (or suggest that others take) any opportunity that is discovered through your work at TJX.

In addition, subject to applicable law, TJX is generally the exclusive owner of any design, concept, invention, formula, or similar creation that you develop or create for TJX 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.
- / In some cases, a relative, co-habitant, or other person with whom you have a romantic or intimate relationship working for a competitor or vendor of TJX.

Disclosing conflicts of interest. Potential conflicts of interest with the Company must be disclosed and addressed. The Company retains the discretion to determine on a case-by-case basis whether a particular situation presents a conflict of interest. **Contact a member of Human Resources or the 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 clarification of our policies on conflicts of interest, noncompetition, or business opportunities, or have a question about whether those policies apply to a particular situation.
- / You wish to pursue outside employment opportunities while employed at TJX that may create a conflict of interest.

Talk to a manager or Human Resources, or contact the TJX Helpline if you have any concerns.

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. This means:

- / 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 or business-related entertainment may be acceptable.
- / 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 policies. You should exercise caution and ask for guidance if in doubt.

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. If you have any questions about gifts and entertainment, ask your manager or the Chief 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.

Talk to a manager or Human Resources, or contact the TJX Helpline if you have any concerns.

For more information, review the TJX Gifts and Entertainment Policy, any local policies or procedures, the TJX Global Conflict of Interest Policy, and the TJX Global Anti-Bribery Policy.

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).

No Associate or third party working on TJX's behalf may offer, authorize, give, request, or accept any bribe or, with improper intent, any other thing of value, to or from any person—whether the other party is a government official or otherwise.

If you are responsible for hiring a third party, make sure you know they are reputable. The contract should include appropriate anti-bribery language. In some circumstances, particularly 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 perform actions that we are prohibited from taking ourselves. If you work with government officials or hire third parties to work with government officials on TJX's behalf, request guidance from the Legal Department.

Contact TJX's Chief Compliance Officer or TJX's General Counsel, or contact the TJX Helpline if you have any concerns.

For more information, review the TJX Global Anti-Bribery Policy.

COMMERCE & INTERNATIONAL TRADE

We comply with applicable requirements for the import and export of goods. When conducting business on behalf of TJX, it is important to have a thorough understanding of local laws, including those that govern international trade. Consult with our Logistics organizations for help complying with appropriate international trade regulations, including those related to the export and import of products.

We are committed to complying with applicable government sanctions and watch lists, including, but not limited to, lists issued by the U.S. Office of Foreign Assets Control or the European Union. We follow anti-money laundering laws throughout the world.

Talk to your manager, contact TJX's Chief Compliance Officer or TJX's General Counsel, or contact the TJX Helpline if you have any concerns.

For more information, review the TJX Economic Sanctions Compliance Policy and the TJX Anti-Money Laundering Policy for U.S. Divisions.

OUR COMMITMENT TO OUR COMPANY AND OUR SHAREHOLDERS



USE OF COMPANY PROPERTY

We use Company property for legitimate Company business. We all have access to Company property to do our jobs at TJX. This property is meant to be used for the benefit of the Company. Company property includes tangible items like equipment, supplies, merchandise, samples, and networks and also intangible things like information, vendor lists, or trademarks. All materials, documents, data, and software relating to TJX, whether written or electronic, are Company property.

In certain instances, we are allowed to use Company-issued electronic devices, such as computers, telephones, and other electronic devices for limited personal purposes. When you use Company property, such as TJX systems, devices, or networks, you should have no expectation of privacy in any electronic or other communications (including emails and text messages) unless otherwise regulated by applicable law.

For more information, review the Acceptable Use Policies in our Information Management Program.

Similarly, TJX may also inspect the contents of your workspace, 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, mobile phones, and tablets), and Company vehicles for business or security reasons where permitted by law.

We dispose of Company property appropriately. Company property is disposed of in accordance with established practices or policies when it is no longer needed for business purposes. Among other things, that means:

- / Do not give away or dispose of TJX property or merchandise, whether current, outdated, damaged, or a merchandise sample, without advance approval by the appropriate supervisor or manager or an authorized TJX representative.
- / Never keep TJX property, merchandise, or merchandise samples for personal use.
- / Take care to properly dispose of electronic equipment or media in accordance with Company policies.
- / If you leave the Company, immediately return Company hardware, including laptops and mobile phones, and immediately return or properly destroy all other Company materials and property including documents, data, and software.

Consult with your manager if you have any questions.

INTELLECTUAL PROPERTY

We safeguard the Company's trademarks and brands. Our Company trademarks and brands are valuable assets. Our intellectual property includes any creations such as our copyrights, trademarks, Company logos, patents, brands, design rights, and trade secrets. It is your responsibility to follow TJX's policies and processes for protecting our intellectual property. If you are not sure that your use of TJX's intellectual property is proper, ask your manager or the Legal Department before continuing your use.

We respect the rights and property of others, including their trademarks and brands. Just as we are careful with TJX intellectual property, we respect others' intellectual property rights. Others may have intellectual property rights in things like designs, images, logos, music, videos, landmarks, software, names, or photographs. Always make sure you have appropriate permission or rights before using others' intellectual property.

PROTECTING INFORMATION

We understand TJX's information management program. Every Associate uses information that relates to TJX, our Associates, or our customers. Many types of information need to be protected from misuse or disclosure both to protect the Company, our Associates, and our customers, and to comply with a variety of laws all over the world.

The **TJX Information Management Policies** describe how TJX classifies and protects information and minimizes collection, use, and access on a "need to know" basis. Familiarize yourself with the **TJX Information Management Policies** and stay current on updates to understand how to treat different classifications of information. Be sure to understand and follow the appropriate requirements for any information you access, particularly before sharing outside of TJX. If you are not sure if information can be shared, check first.

We recognize the importance of working with third parties that are committed to the appropriate handling of Associate, customer, and other parties' information. When retaining a third party, be sure to follow the requirements specified in the **Service Provider Policy** part of the Information Management Program.

We use common sense and good judgment when using our systems. Always follow Company policies and procedures concerning acquiring and downloading software and online resources and protect TJX's passwords, computer hardware, networks, and the information stored on them.

We respect the confidentiality of TJX's information, even after we leave the Company. As TJX Associates, we are responsible for keeping certain information in our possession secure and confidential while working at TJX. Subject to applicable law, that obligation continues even after you depart from the Company. In particular, Business or Personal Information (as defined in the **TJX Information Management Policies**) may 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.

Nothing in this Code is intended to limit or restrict your ability to communicate with a governmental agency concerning matters within the scope of that agency's authority.

MANAGING COMPANY DOCUMENTS

We manage hard copy and electronic documents responsibly. It is important to:

- / Keep Company documents only as long as they are needed.
- / Review your department's record retention schedule, and comply with it.
- / Remember that any documents subject to a legal hold notice must be retained in accordance with the specific hold notice for those documents.
- / Dispose of all printed documents in a secure disposal bin in accordance with Company policy.
- / Contact the IT Service Desk to properly dispose of electronic equipment, storage devices, or other electronic media.

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. If a document's useful life is longer than two years, it should be on a retention schedule. 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.

Report any Information Security or Privacy concerns as follows:

Threats to TJX Information Security. If you learn of any actual or suspected threat to TJX's information security (phishing, harmful software, lost TJX information or equipment) report it to:

Electronic Events: 508-390-2164
IT Security Operations Center: SOC@tjx.com

Paper or Non-Electronic Events: 508-390-2277
Loss Prevention: lpincidentresponse@tjx.com

Violations of TJX information Security/Privacy Policies. If you learn of any actual or suspected violation of TJX's Information Security Policies or Privacy Policies, promptly report it to any of the following:

IT Security Operations Center: 508-390-2164 or SOC@tjx.com
TJX Helpline: (Appropriate telephone number on page 6) or TJXethicsline.ethicspoint.com
Your manager or other reporting contact identified in the Code.

Customer Concerns about Personal Information. If you receive a customer inquiry or complaint about TJX's handling of personal information, promptly send the inquiry or complaint to the following, based on the customer's location:

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, do not forget to dial your country's exit code + destination country code + phone number.

INSIDER TRADING

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. Insider trading laws prohibit buying or selling a company's stock or other securities when we have material information (which could include 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) that is not available to the public. Material non-public information is sometimes called "inside information."

Do not:

- / Buy or sell stock or other securities of TJX when you possess inside information about TJX. This applies to any transaction, even in a personal account, as well as the exercise of options followed by an immediate sale of the stock on the market (a "cashless exercise").
- / Buy or sell stock or other securities of another company when you possess inside information about that company.
- / Share inside information with others, even relatives or household members (sometimes called "tipping"). "Tipping" is prohibited even if you do not think the recipient will trade on that information.

These rules apply to everyone at TJX as well as their families and entities they control.

All Associates are subject to the **TJX Global Insider Trading Policy** and certain Associates may be subject to additional restrictions under that policy.

Talk to a manager or contact TJX's General Counsel, email tradingQs@tjx.com, or contact the TJX Helpline if you have any concerns.

For more information, review the TJX Global Insider Trading Policy.

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 and be prepared in accordance with applicable accounting rules and standards. Our processes and controls are designed to ensure that expenditures and transactions are authorized. They are also designed to make sure that TJX assets are used properly and that all expenditures, transactions, assets, and liabilities are properly reflected in our financial records. All reports and records you create or are otherwise responsible for must be complete, accurate, timely, and prepared in accordance with applicable accounting rules and standards.

You should understand how to accurately prepare all records and complete all processes required by your job. Be sure to ask your manager 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.

Contact the Corporate Internal Audit Director, TJX's General Counsel, or the TJX Helpline if you have any concerns.

REPORTS OF ACCOUNTING & 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.

We cooperate fully with internal and external audits, including responding to internal and external audit requests. Remember that when asked to assist in an audit or 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 and do not encourage anyone else to do so.

Contact TJX's Corporate Internal Audit Director, TJX's General Counsel, or the TJX Helpline to report any suspected violations of financial, accounting, or reporting standards, or if you have any other concerns.

GLOBAL COMMUNICATIONS

We protect the Company's reputation. As a public company, TJX's external corporate communications efforts are centrally managed so that information we share publicly is accurate and consistent. The Global Communications Department must typically review, in advance, documents and communications that include business information about TJX or its divisions that are intended (or expected) to be made public including, for example, divisional press releases, external facing brochures, other materials that will be placed in the public domain, or content for external speaking engagements. In addition, even with internal communications, be mindful of possible inconsistencies with what we have communicated externally and contact Global Communications if you notice any discrepancies.

TJX Global Communications or a division's Media Relations Department field all media inquiries.

TJX Global Communications and brand media relations teams are the primary authorized media spokespersons for the Company. Only authorized TJX spokespersons are permitted to speak to the media (including via traditional and social media), investors, or the general public regarding Company matters.

If the media or someone else asks to take photographs or videos or approaches you for a comment by the Company or information about the Company, even informally, 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.

Immediately notify a member of management or your manager if you are contacted by members of the media.

Please ask media to contact Global Communications or your division's Media Relations Departments directly. The TJX Global Communications number, 508-390-2323, as well as each brand's media relations line, are monitored throughout the day, as well as nights and weekends.

TJX Global Communications reviews external speaking opportunity requests. We recognize that Associates are sometimes asked and/or wish to participate in external speaking opportunities on behalf of TJX, such as events, conferences, college classes, podcasts, panel discussions, award ceremonies, fundraisers, etc.

Associates who wish to participate in an external speaking engagement are required to follow the External Speaking Events Policy, available on The Thread.

USE OF SOCIAL MEDIA

TJX maintains social media policies across the Company. Among other things, remember that these policies apply to our actions online whether work-related or not. The policies, for example, remind us that we should not:

- / Post any content about an Associate or customer that is harassing or discriminatory.
- / Post, or reply to, any content about the Company, its executives, products, or services that is malicious, obscene, threatening, intimidating, or knowingly false.
- / Use TJX's logos or trademarks in a way that suggests that the Company is sponsoring the content or that relates to content that is illegal or in violation of any TJX policy.
- / Post responses to comments on Company-sponsored social media sites (TikTok, Instagram, X/Twitter, Facebook, or others) that suggest that you are speaking on the Company's behalf, unless formally authorized to do so.

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

Remember that some social media activity may also create a conflict of interest. Be sure to review the TJX Conflicts of Interest Policy.

Contact a manager, Human Resources, Global Communications, your division's Media Relations Department, or the TJX Helpline if you have any concerns.

OUR COMMITMENT TO OUR COMMUNITIES



CORPORATE CITIZENSHIP

We are committed to acting as a good corporate citizen in the communities where TJX operates. At TJX, we respect human rights and believe it is important to seek out suppliers and other third parties who do so as well. We expressly prohibit the use of child labor and forced or involuntary labor anywhere within our own operations through our Vendor Code of Conduct, which is incorporated in our merchandise purchase order terms and conditions.

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 at your own 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.

POLITICAL ACTIVITIES & CONTRIBUTIONS

We do not use Company funds for political contributions. If you contribute personal time or funds to political activities, make sure it is clear that your efforts are on your own behalf and not on TJX's. TJX does not make direct contributions of corporate funds to candidates or political parties. TJX also does not generally participate in direct public policy or political or legislative advocacy. Any use of Company funds or resources for this kind of activity must be approved by our CEO, CFO, or General Counsel.

We respect each other's choices about political participation. TJX 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.

For more information, review the TJX Statement on Political Activity and Expenditures available at www.TJX.com.

THE ENVIRONMENT

We are committed to mitigating our impact on the environment and operating responsibly. 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 have created internal initiatives that are designed to conserve natural resources, create less operational waste, use less energy, and be economically sound and we are all encouraged to make operational decisions that reduce environmental impact.

ADDITIONAL CONTACTS

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

Chief Compliance Officer	508-390-6570 complianceofficer@tjx.com
Compliance Director	508-390-6510 asstcomplianceofficer@tjx.com
Corporate Internal Audit Director	508-390-6540 corporateauditdirector@tjx.com
Global Communications	508-390-2323 global_communications@tjx.com
Corporate Legal Department	508-390-6550 lawyer@tjx.com
Privacy Group	508-390-2280 tjx_privacy_office@tjx.com
Global Product Safety	U.S.: product_compliance@tjx.com Canada: product_safety@tjxcanada.ca Europe: merchandise_compliance@tjxeurope.com Australia: australiacompliance@tjxaustralia.com.au

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