



# Vendor Code of Conduct



introduction

standards of vendor  
engagement

global trade  
& security

product quality  
& safety

conflicts of interest

compliance with  
anti-corruption laws

confidentiality,  
security & privacy

reporting violations

# Introduction



A hallmark of the Target brand is treating everyone with respect, from the guests who shop with us, to the team members who bring the brand to life, to the shareholders who support us and to the communities where we do business. That dedication to respect is demonstrated by behaving with integrity, which is essential to our business.

And as we tell our own team members, our commitment to doing business ethically and legally means that we'll work only with vendors and suppliers who share the same commitment.

Because we place such a high priority on ethical and legal conduct, we require all of our merchandise vendors to read, understand and comply with our Standards of Vendor Engagement and all other conditions of doing business with Target. Additionally, we expect our vendors to ensure all of their factories understand and comply with these expectations. Failure to conduct business in a manner that meets these standards could result in a termination of the vendor relationship with Target.

Because no code can cover all policies or laws, if you have questions about any of the information in this code, or what is expected of you, please email [Integrity@Target.com](mailto:Integrity@Target.com).

In addition, if you suspect unethical or illegal business practices, it is your responsibility to report it using the resources outlined on page nine of this code.

Thank you for your commitment to upholding our high standards of conduct. Together, we can maintain Target's strong reputation for excellence.

# Standards of Vendor Engagement

Respect for human rights is a fundamental principle throughout our business practices and standards. We expect our vendors to share our ethical concerns and uphold our standards. We hold all vendors, manufacturers, contractors, subcontractors and suppliers accountable for abiding by these standards throughout our supply chain and in the manufacture and finishing of products ordered by Target. The following standards are used in assessing vendors and factories.

## Safe and Healthy Workplace

Our vendors must work with factories that provide a safe and healthy workplace and comply with local laws. If factories provide residential facilities for their workers, they must be safe, healthy and in compliance with local standards.

## No Forced or Compulsory Labor

We condemn forced labor and will not knowingly work with vendors who use forced labor in the manufacture of products for Target.

## Fair Disciplinary Practices

We will not knowingly work with vendors whose factories utilize physical or mental punishment against their employees.

## No Discrimination

We respect cultural differences, and believe workers should be employed based on their abilities, rather than their race, gender, personal characteristics or beliefs and encourage our vendors to eliminate discrimination in their workplaces.

## Reasonable Working Hours and Overtime

We seek vendors who work with factories that do not require a work week that exceeds local laws or business customs and who do not require a work week of more than 48 hours, plus a maximum of 12 hours overtime, on a regularly scheduled basis. Workers shall have at least one in seven days off.



## Fair Wages

We seek vendors who work with factories that provide wages and benefits in compliance with local laws. We encourage our vendors to commit to the betterment of wage and benefit levels to address the basic needs of workers and their families.

## No Child Labor

We will not knowingly work with vendors whose factories utilize child labor. We define child labor as either being below the local minimum working age, or the age of 15, whichever is greater.

## Environment

We seek vendors whose factories operate in compliance with environmental laws and that work to minimize their impact on their surroundings and global resources. To learn more about Target's commitment to sustainability, visit corporate.target.com/corporate-responsibility/environment.

**For more information** on Target's Standards of Vendor Engagement, vendors can visit the [training](#) section on Partners Online. Additional detail can also be found at [target.com/corporateresponsibility](#).



# Global Trade & Security



We rely on vendor partners to ensure that all products sold to Target comply with all applicable laws, regulations, and standards, including the laws that regulate global trade such as laws governing country of origin, importation, customs entry, export, licensing and sale of imported merchandise. Vendors must ensure that all product markings and documentation are true and accurate and that appropriate records are maintained to validate information provided on all documents.

We work with our business partners to strengthen the international supply chain by operating in compliance with our global security criteria, including the U.S. Customs Trade Partnership Against Terrorism (C-TPAT) program and Canada Customs Partners in Protection (PIP) program guidelines. We expect our vendor partners to be familiar with these guidelines and to use the forms available on Partners Online.

**For more information** about Business Integrity expectations, visit Partners Online to read the U.S. Customs C-TPAT and Canada Customs PIP guidelines and access the following forms: customs compliance, import classification, and import shipping.

# Product Quality & Safety



Guests count on Target for well-designed, high-quality products at a great value. They also trust us to sell safe and compliant products. We expect our vendors to help us meet that commitment by following our Conditions of Contract and our Product Safety and Quality Assurance Process.

Our Conditions of Contract require that our vendors guarantee that all goods sold to Target are made in compliance with all applicable laws, and that all manufacturers and subcontractors also comply with the law.

For Target brand products, we expect all vendors – or factories producing product on behalf of vendors – to comply with our Product Safety and Quality Assurance process.

## Unethical Conduct

Product Safety and Quality Assurance (PSQA) processes are not only business requirements, but help ensure product is safe and in compliance with the law. Target's expectation is that no vendor, or factories producing product on behalf of the vendor, will attempt to circumvent Target's PSQA process through unethical conduct.

**For more information,** read our Ethical Quality Assurance Behavior Statement.

# Conflicts of Interest



Target team members are required to avoid not only conflicts of interest but also activities that could give the appearance that a vendor has somehow improperly influenced a team member in order to receive favorable treatment.

Vendors are required to avoid actions that may result in conflicts of interest, which include offering, providing or reimbursing personal gifts, favors, personal travel expenses, lodging or other housing, services of any kind, excessive meals or entertainment, or any other thing of value to Target team members.



# Compliance with Anti-Corruption Laws



Vendors are required to comply with all applicable anti-corruption laws including, but not limited to, the U.S. Foreign Corrupt Practices Act. Under no circumstances may a vendor working for Target offer, promise, or provide anything of value directly or indirectly to a government official for the purpose of exerting improper influence or to obtain or retain an improper benefit or advantage.

Vendors are required to complete our due diligence review process prior to representing Target before any government official. Additionally, if a vendor hires a third party to work on a project that requires interaction with a government official on behalf of Target, the vendor must closely monitor the actions of the third party to ensure compliance with anti-corruption laws.

All invoices submitted to Target for payment or reimbursement require accurate and adequate supporting documentation and may not mischaracterize or disguise any transaction or expenditure.

**For more information,** see the U.S. Foreign Corrupt Practices Act.

# Confidentiality, Security & Privacy



We know that our vendors can be even better partners when we share the right information. When we trust vendors with confidential information, we expect our partners to protect it just as carefully as we would.

We expect our vendors to comply with applicable security and privacy laws, regulations and retention requirements, and to ensure that they have appropriate technical and security controls in place to protect our confidential information.

Confidential information means all non-public Target data, including: Business plans, retail pricing strategies, marketing plans, team member personal information, guest personal information and intellectual property. Vendors may not outsource, disclose, share, or use this information outside the requirements defined in their contractual or non-disclosure agreement with Target. Unauthorized disclosures could harm Target, breach the vendor contract, or may even be illegal.



# Reporting Violations



Simply put, we expect our vendors to follow the law and the information in this code and to promptly report any actual or suspected violations, including violations by any team member or individual acting on behalf of Target or one of our vendors.

## How to Report

- ➔ Call the Integrity Hotline at 1-800-541-6838  
(Outside the U.S. and Canada: 704-556-7046).
- ➔ Send an email to [Integrity@Target.com](mailto:Integrity@Target.com)
- ➔ Write to: Target Corporation  
1000 Nicollet Mall  
Minneapolis, MN 55403 USA  
Attention: Corporate Compliance and Ethics Team

You may choose to remain anonymous if you call the Integrity Hotline. All reported violations that include specific information will be investigated and appropriate action will be taken.