THE TJX COMPANIES, INC.
GLOBAL ANTI-BRIBERY POLICY

POLICY STATEMENT

The TJX Companies, Inc., including all of its divisions and subsidiaries worldwide (collectively, “TJX”), is committed to doing business in accordance with the highest ethical standards and in compliance with law. Accordingly, it is TJX’s policy that Covered Persons (defined below) must comply with all applicable anti-bribery and anti-corruption laws, including the U.S. Foreign Corrupt Practices Act (“FCPA”), the U.K. Bribery Act, the Canadian Corruption of Foreign Public Officials Act (“CCFPOA”), and all other similar applicable laws, as set out below (“TJX’s Global Anti-Bribery Policy”). Covered Persons must also maintain accurate books and records reflecting all TJX transactions.

TJX takes corruption and bribery very seriously and any Covered Person found to be in violation of TJX’s Global Anti-Bribery Policy shall be subject to appropriate corrective action up to and including summary termination of employment or services and/or legal action. Covered Persons must report any known or suspected violations of TJX’s Global Anti-Bribery Policy, consistent with local law requirements.

WHAT THIS MEANS

Who is a “Covered Person” under TJX’s Global Anti-Bribery Policy?

The following individuals and entities are Covered Persons and must follow TJX’s Global Anti-Bribery Policy:

1. All Associates, officers, directors and agents of all TJX divisions and subsidiaries worldwide; and

2. All third party individuals and entities, including but not limited to the list below, if they act on behalf of TJX:

   - Contractors
   - Agents or other intermediaries
   - Brokers
   - Buying agents
   - Customs brokers
   - Licensing agents
   - Consultants
   - Professional services firms
   - Representatives.
What is a Bribe?

A Bribe is:

1. An offer, payment, promise to pay or authorization of the payment of money or anything else of value intended corruptly to persuade, induce or reward the recipient for performing a function or activity; or
2. Requesting, receiving or accepting a payment of money or anything else of value intended corruptly to persuade, induce or reward the recipient for performing a function or activity; or
3. An offer, payment, promise to pay or authorization of the payment of money or anything else of value to a Government Official intended to influence any act or decision by the Official, to induce the Official to do or omit to do any act in violation of the Official’s lawful duty, to secure any improper advantage from the Official, or to induce the Official to use his or her influence with a government or instrumentality thereof to affect that government’s actions or decisions, in order to obtain or retain business.

   a. “Government Officials” means any person exercising a public function and/or acting in an official capacity on behalf of a government agency, department, or instrumentality, political party, or candidate for political office, and includes officials or employees of federal, state, provincial, county or municipal governments or any department or agency thereof; any officers or employees of a company or business owned in whole or in part by a government (“state-owned enterprise”); any officers or employees of a public international organization (for example, the World Bank, United Nations, or the European Union); any political party or official thereof; or any candidate for political office. Government Officials include officials at every level of government, regardless of rank or position.

Examples of items of value which could constitute a Bribe include, but are not limited to:

- Travel
- Gifts
- Entertainment
- Political or charitable contributions
- Offers of employment
- Stock
- Assumption or forgiveness of debts or loans.

What does TJX’s Global Anti-Bribery Policy prohibit?

- Covered Persons must not offer, make, promise, or authorize a Bribe to any individual, whether that individual is public (e.g., a Government Official) or private.

- Covered Persons must not request, receive, or accept a Bribe from any individual, whether that individual is public (e.g., a Government Official) or private.
• This Policy prohibits all Bribes, whether they are direct, i.e., made or accepted through or by a Covered Person, or indirect, i.e., made or accepted through or by another individual or entity on TJX’s behalf.

• Covered Persons must maintain complete, accurate and detailed books and records with respect to all transactions and disposition of assets undertaken on behalf of TJX.

• No Covered Person may knowingly make or cause others to make false or misleading entries in the books and records of TJX, maintain or cause others to maintain any undisclosed or unrecorded funds, assets, or liabilities, or falsely report or cause others to falsely report the purpose of any payment made on behalf of TJX.

**How should TJX control third party Covered Persons?**

• All arrangements with third parties acting on behalf of TJX must be, as appropriate, documented in written contracts containing representations and warranties or other obligations with respect to TJX’s Global Anti-Bribery Policy and similar applicable laws.

• Third parties must not be engaged to act on behalf of TJX with any governmental entity without appropriate due diligence and a written contract containing representations and warranties or other obligations with respect to TJX’s Global Anti-Bribery Policy and similar applicable laws.

**Are any gifts or entertainment permitted?**

• Giving or accepting gifts or entertainment may be viewed as improper attempts to influence business relationships.

• **Government Officials:** Do not solicit, accept, offer or give any gifts, entertainment or other things of value from/to Government Officials without the prior approval of TJX’s Chief Compliance Officer or General Counsel.

• **Private Individuals/Entities:** Do not solicit, accept, offer or give any gifts, entertainment or other things of value from/to individuals who do (or may do) business with TJX, who are seeking to do business with TJX, or whose business is being sought by TJX.

  • **Exceptions:** Certain gifts and entertainment may be permitted as set forth in TJX’s Gift Policy, which is stated in TJX’s Global Code of Conduct.
    • Some examples include gifts of nominal value (such as promotional materials like pens and calendars, or flowers or food) and occasional invitations to local entertainment when the value is small and other conditions are met. Consult the Gift Policy for more information.
    • Certain TJX businesses or divisions may impose stricter standards, so always check and follow any local or supplemental gift policy that may apply to you.
• You must never accept any gift or offer of entertainment if it would affect your ability to act in TJX’s best interests. Avoid all situations that create, or might create, even the appearance of a conflict of interest.

**What are the penalties for violating TJX’s Global Anti-Bribery Policy?**

• Violation of TJX’s Global Anti-Bribery Policy by a Covered Person is grounds for corrective action, up to and including summary termination of employment or services, and/or legal action.

• Violation of the FCPA, the U.K. Bribery Act, the CCFPOA and other similar local laws applicable to the Company may result in severe legal penalties, up to and including imprisonment and significant fines for the individuals who commit the violation. Fines imposed on individuals will *not* be paid by TJX.

**Reporting Violations and Raising Questions.**

• Covered Persons must promptly report any known violations or suspicious activity that may violate TJX’s Global Anti-Bribery Policy, consistent with local law requirements.

• Contacts for TJX Associates:
  • TJX’s Chief Compliance Officer;
  • TJX’s General Counsel;
  • The TJX Code of Conduct Helpline, which allows for anonymous reporting where permitted by applicable law or regulation; or
  • Your immediate supervisor or other contacts identified in TJX’s Global Code of Conduct for the reporting of violations.

• Contact for third party Covered Persons:
  • TJX’s Chief Compliance Officer; or
  • TJX’s General Counsel.

• The failure to report known or suspected violations of TJX’s Global Anti-Bribery Policy may lead to appropriate corrective action up to and including termination of employment or services, subject to applicable local law requirements. TJX will not tolerate any form of retaliation against, or victimization of, Associates or others for making good faith reports.

• Questions concerning a potential violation of TJX’s Global Anti-Bribery Policy should be referred to TJX’s Chief Compliance Officer or General Counsel before any further steps are taken.