

Abiding Practices

California Transparency Supply Chain Act

Our Policy is the standard that we apply to vendor partners and includes, but is not limited to, merchandise covered by the California Transparency in Supply Chains Act. The act, implemented in January 2012, requires large retail sellers and manufacturers doing business in California with annual worldwide gross receipts that exceed \$100 million, to provide disclosures about their “efforts to eradicate slavery and trafficking in their direct supply chains for tangible goods offered for sale.” Our Policy strictly prohibits the use of prison, labor, bonded labor, indentured labor, or forced labor in the manufacture or finishing of products we order, including without limitation, prison and slave labor, or human trafficking for the purposes thereof.

Our Policy is enforced through:

Verification

- Working with our vendor partners to raise awareness of the issue of human trafficking.
- Requiring all vendor partners that produce proprietary merchandise for Kohl's to certify that each facility used to produce merchandise sold to Kohl's will operate in compliance with our Policy and all applicable laws, including, but not limited to, laws regarding slavery and human trafficking in the countries in which they do business.
- Requiring vendor partners to maintain documentation necessary to demonstrate compliance in factories producing merchandise for Kohl's.
- Requiring our review and approval of all subcontractors that a vendor desires to use in the manufacturing process of Kohl's proprietary goods.
- Enforcing our zero-tolerance policy regarding forced labor, prison labor, slavery and human trafficking.

Audit

- Actively monitoring factories in which our proprietary merchandise is produced using the contracted services of independent, professional third-party social compliance monitoring firms to perform both announced and unannounced factory audits.
- Monitoring each such factory for social compliance on a periodic basis at a frequency based upon a risk assessment and prior audit findings.

Certification

- In addition to the standards set forth in our Policy, any vendor partner desiring to do business with us must adhere to the terms of the contract under which we purchase goods from the vendor.

Internal Accountability

- Employing dedicated Policy compliance personnel who are responsible for the day-to-day duties and administration of the compliance program, and who are not involved in the product purchase negotiations.

Training

- Providing training for relevant company associates regarding identification and mitigation of the risks addressed by our Policy.