



## **FACTORY COMPLIANCE POLICY ON HOMEWORKING**

### **Kohl's Policy Statement**

Kohl's Department Stores, Inc. prohibits the use of homeworkers in its supply chain for private brand or exclusive brand merchandise or where Kohl's is the importer of record for the goods. Factory compliance monitoring mechanisms are not currently available to adequately mitigate increased risks of noncompliance (i.e. child labor, forced labor, working hours, wages and benefits, health and safety, etc.) that exist in the homeworking environment.

Kohl's definition of homework is based upon the International Labor Organization (ILO) definition (1996, C177, Article 1) which states:

- a) the term homework means work carried out by a person, to be referred to as a homeworker,
  - 1) in his or her home or in a premises of his or her choice, other than the workplace of the employer,
  - 2) for remuneration,
  - 3) which results in a product or service as specified by the employer, irrespective of who provides the equipment, materials or other inputs used, unless this person has the degree of autonomy and economic independence necessary to be considered an independent worker under national laws, regulations or court decisions;
- b) persons with employee status do not become homeworkers within the meaning of this Convention simply by occasionally performing their work as employees at home, rather than at their usual workplaces;
- c) the term employer means a person, natural or legal, who, either directly or through an intermediary, whether or not intermediaries are provided for in national legislation, gives out home work in pursuance of his or her business activity.

Kohl's Department Stores, Inc. is committed to improving working standards in its supply chain through the application of international labor standards and monitoring business partner compliance with Kohl's Terms of Engagement and the laws of the country in which private/exclusive brands are produced.

### **Kohl's Expectations of its Suppliers**

Kohl's expects its agents and Vendor Partners from whom goods are sourced to enforce the above policy prohibiting the use of homeworkers in its supply chain for private brand or exclusive brand merchandise or where Kohl's is the importer of record for the goods.