

Kohl's Corp.

TICKER
NYS:KSS

MARKET CAPITALIZATION
US\$11 billion

HEADQUARTERS
United States

DISCLOSURES

UK Modern Slavery Act: Not applicable

California Transparency in Supply Chains Act: Yes

TARGETS

Yes

Kohl's Corp. (Kohl's), one of the largest department stores in the US,¹ has taken some steps to address forced labor risks in its supply chains. It discloses about the same amount of information as the global sector average. Other department stores such as Lojas Renner and Marks and Spencer disclose taking stronger steps. Kohl's states that it is part of a forced labor working group, a joint initiative of several industry associations, but it does not otherwise disclose any steps it has taken to address the risks of alleged Uyghur forced labor across its supply chain tiers.

STEPS TAKEN TO ADDRESS FORCED LABOR RISKS IN SUPPLY CHAINS



SUPPLY CHAIN TRANSPARENCY

Supplier List 🚩 No
 Information on Supply Chain Workers 🚩 No

HIGH-RISK RAW MATERIALS²

🚩 Cashmere, cotton, and silk

HIGH-RISK SOURCING COUNTRIES

🚩 China, India, Vietnam

¹ ScrapeHero (30 September 2020), "[The Largest Department Stores in the US - Location Analysis.](#)"

² For further details on high-risk raw materials and sourcing countries, see KnowTheChain's [2021 Apparel and Footwear Benchmark Report.](#)

SUBSET OF INDICATORS

	 NOT MET  PARTIALLY MET  MET	Policy / Process	Outcomes
Supplier Code of Conduct / Integration into Supplier Contracts			
Management and Accountability			Not Applicable
Internal Management			
Board Oversight			
Stakeholder Engagement			Not Applicable
Local Stakeholders			
Peers			
Risk Assessment			
Purchasing Practices			
Recruitment Fees			
Freedom of Association			Not Applicable
Working with Unions			
Examples of Improvements			
Grievance Mechanism			
Remedy Programs / Remedy Outcomes and Response to Allegations			

Kohl's discloses internal accountability for its social compliance program and board oversight over its human rights policies. The company's supplier code prohibits the use of forced labor and the charging of recruitment fees, and it requires its supplier to provide grievance mechanisms and train workers on such mechanisms. It further notes that grievances can be raised via its Integrity Hotline. The company does not seem to address forced labor risks in relation to third-party products.

Additional steps the company could take include

- assessing forced labor risks in its supply chains and disclosing the risks identified;
- working with trade unions to support freedom of association in its supply chains and disclosing examples of how it improved freedom of association for supply chain workers; and
- establishing a process to ensure that remedy is provided to supply chain workers in cases of labor rights violations and disclosing examples of remedy outcomes for workers.

COMPANY ENGAGED WITH KNOWTHECHAIN³

Yes ([Provided Additional Disclosure](#)).

³ Research conducted through November 2020 or through February 2021, where companies provided additional disclosure or links. For more information, see the full dataset [here](#). For information on a company's positive and negative human rights impact, see the [Business & Human Rights Resource Centre website](#).