

Conflicts of Interest Statement

NEW HIRE (- Level 10)

Question 1

Do you have a Family Member or have a Close Personal Relationship with someone who performs services (e.g., as an employee, contractor, consultant) or receives compensation for promoting brands, products, or services for a Target Vendor, Prospective Vendor or a Competitor?

Target Definitions

Family Member: A team member's spouse, parents, stepparents, children, stepchildren, siblings, mothers- and fathers- in-law, and brothers- and sisters-in-law, and in addition to those relatives, anyone (other than tenants or domestic employees) who shares that team member's home.

Close Personal Relationship: A team member's domestic partner, or a person involved with that team member in a consensual, committed, intimate, or romantic relationship, or a significant business relationship.

Vendor: Any person or entity that does business with Target, including, but not limited to merchandise ("direct") vendors, non-merchandise ("indirect") vendors, suppliers, consultants and consulting firms, auditors, industry groups, trade associations, Target "Accelerator Program" participants, or any other service provider. Vendors are sometimes called "business partners" by Target teams. "Vendor" also includes the agents and representatives of any Vendor.

Prospective Vendor: Any person or entity seeking to do business with Target, including but not limited to merchandise ("direct") vendors, non-merchandise ("indirect") vendors, consultants and consulting firms, auditors, industry groups, trade associations, Target "Accelerator Program" participants, and other service providers. For this Policy, the definition of "Prospective Vendor" also includes the agents and representatives of any Prospective Vendor

Competitor: Any for-profit entity that directly competes with Target based on product assortment or services.

- **No**
- Yes, I have a Family Member or Close Personal Relationship with someone who performs services and/or receives compensation for promoting brands, products or services for a Target Vendor, Prospective Vendor or a Competitor.

If you answered yes, please advise the following:

What is the name of the organization/entity where your Family Member/Close Personal Relationship works or otherwise receives compensation?

What is your relationship to the Family Member/Close Personal Relationship, and what is that person's name?

What is the business relationship between the organization/entity and Target, if known? Do you work directly or indirectly with this external organization/entity, or have the ability to influence business decisions (e.g., directly or indirectly engage with, supervise, approve, invoice, or impact Target business decisions involving this organization / entity within your reporting hierarchy) in your role at Target? If yes, please describe.

Please provide any other information relevant to determine if a conflict of interest may exist.

Question 2

Do you perform external work or services (e.g., as an employee, contractor, consultant, or business owner) or receive anything of value for promoting or endorsing brands, products, or services outside of your work at Target?

- **No**
 - Yes, I perform external work or services and/or receive something of value for promoting or endorsing brands, products, or services outside of Target work.

If you answered yes, please advise the following:

What is the name of the external organization/entity where you are employed, or from whom you receive compensation or anything else of value? Describe the nature of the business, including the type(s) of work or services you perform, or the products, brands, or services you promote or endorse.

Is this external organization/entity a Target Vendor, Prospective Vendor, or a Competitor? If yes, please provide additional detail in response to the following questions:

Do you work directly or indirectly with this external organization/entity, or have the ability to influence business decisions (e.g., directly or indirectly engage with, supervise, approve, invoice, or impact Target business decisions involving this organization/entity within your reporting hierarchy) in your role at Target? If yes, please describe.

Do you have access to confidential information or intellectual property related to business dealings between Target and this external organization?

Please provide any other information relevant to determine if a conflict of interest may exist.

Question 3

Do you hold an Advisory Role or serve as a member of an Advisory Board or Board of Directors for an external for-profit organization/entity (whether public or private) or for a professional, trade, or industry organization?

Target Definitions

Advisory Role: A position with responsibilities that include providing expertise and making recommendations to an organization based on an individual's knowledge or expertise that supports the organization's objectives.

Advisory Board: Group of experts convened by an organization to offer non-binding advice, strategy, or recommendations that support the organization's objectives.

Board of Directors: The governing body of an organization. A Board of Directors typically provides expertise, guidance, direction, and supervision of an organization's activities.

- **No**
 - Yes, I hold an Advisory role, and/or serve as a member of an Advisory Board or Board of Directors for an external for-profit organization/entity, and/or for a professional, trade or industry organization.

If you answered yes, please advise the following:

Please provide a description of your duties/role with this organization/entity, and the name of the organization/entity, and whether you receive compensation for this role.

Is this opportunity personal or related to your role at Target? If related to your role at Target, please describe the benefit to Target/your team for your participation.

Is your leader aware of and supportive of this role?

What type of relationship, if any, does the external organization/entity have to Target? If there is a relationship with Target, does your role at Target require you to interact or work with the organization/entity and/or do you have the ability to influence Target business decisions regarding this organization/entity? If yes, please describe.

Please provide any other information relevant to determine if a conflict of interest may exist.

Question 4

Do you have a Substantial Investment in a Target Vendor, Prospective Vendor, or Competitor?

Target Definitions

Substantial Investment: Any investment of either \$20,000 USD or more of cash or a cash equivalent, or 10% of the outstanding ownership interest of a Vendor, Prospective Vendor or a Competitor. Investments include but are not limited to stocks, stock options, notes, bonds, debt, or other 'direct interest' securities held by you, a Family Member, or a person with whom you have a Close Personal Relationship.

Vendor: Any person or entity that does business with Target, including but limited to merchandise ("direct") vendors, non-merchandise ("indirect") vendors, suppliers, consultants and consulting firms, auditors, industry groups, trade associations, Target "Accelerator Program" participants, or any other service provider. Vendors are sometimes called "business partners" by Target teams. "Vendor" also includes the agents and representatives of any Vendor.

Prospective Vendor: Any person or entity seeking to do business with Target, including but not limited to merchandise ("direct") vendors, non-merchandise ("indirect") vendors, consultants and consulting firms, auditors, industry groups, trade associations, Target "Accelerator Program" participants, and other service providers. For this Policy, the definition of "Prospective Vendor" also includes the agents and representatives of any Prospective Vendor.

Competitor: Any for-profit entity that directly competes with Target based on product assortment or services.

- **No**
 - Yes, I have a Substantial Investment in a Target Vendor, Prospective Vendor, or Competitor.

If you answered yes, please advise the following:

Please describe your Substantial Investment. What is the name of the organization/entity?

What is the organization's/entity's relationship to Target?

Do you work directly or indirectly with this external organization/entity, or have the ability to influence business decisions (e.g., directly or indirectly engage with, supervise, approve, invoice, or impact Target business decisions involving this organization/entity within your reporting hierarchy) in your role at Target? If yes, please describe.

Please provide any other information relevant to determine if a conflict of interest may exist.

Question 5

Do you have knowledge that a Family Member, or someone with whom you have a Close Personal Relationship, has a Substantial Investment, in a Vendor, Prospective Vendor, or Competitor?

Target Definitions

Family Member: A team member's spouse, parents, stepparents, children, stepchildren, siblings, mothers- and fathers- in-law, and brothers- and sisters-in-law, and in addition to those relatives, anyone (other than tenants or domestic employees) who shares that team member's home.

Close Personal Relationship: A team member's domestic partner or a person involved with that team member in a consensual, committed, intimate, or romantic relationship, or a significant business relationship

Substantial Investment: Any investment of \$20,000 USD or more of cash or a cash equivalent, or 10% of the outstanding ownership interest with a Vendor, Prospective Vendor or Competitor. Investments include but are not limited to; stocks, stock options, notes, bonds, debt or other "direct interest" securities held by you, a Family Member or a person with whom you have a Close Personal Relationship with.

Vendor: Any person or entity that does business with Target, including, but not limited to merchandise ("direct") vendors, non-merchandise ("indirect") vendors, suppliers, consultants and consulting firms, auditors, industry groups, trade associations, Target "Accelerator Program" participants, or any other service provider. Vendors are sometimes called "business partners" by Target teams. "Vendor" also includes the agents and representatives of any Vendor.

Competitor: Any for-profit entity that directly competes with Target based on product assortment or services.

- **No**

- Yes, I have knowledge of a Family Member, or someone with whom I have a Close Personal Relationship, who has a Substantial Investment in a Target Vendor, Prospective Vendor or Competitor.

If you answered yes, please advise the following:

Please describe the Substantial Investment.

What is the name of the Family Member/Close Personal Relationship and your relationship to that person (e.g., you, spouse, brother, sister, mother, domestic partner, etc.).

What is the name of the organization/entity, and their relationship to Target?

Do you work directly or indirectly with this external organization/entity, or have the ability to influence business decisions (e.g., directly or indirectly engage with, supervise, approve, or invoice, or impact Target business decisions involving this organization/entity within your reporting hierarchy) in your role at Target? If yes, please describe.

Please provide any other information relevant to determine if a conflict of interest may exist.

Question 6

Have you negotiated or influenced a transaction on behalf of Target with an external organization/entity in which you, or a Family Member, or someone with whom you have a Close Personal Relationship, have a Financial Interest?

Target Definitions

Family Member: A team member's spouse, parents, stepparents, children, stepchildren, siblings, mothers- and fathers- in-law, and brothers- and sisters-in-law and in addition to those relatives, anyone (other than tenants or domestic employees) who shares that team member's home.

Close Personal Relationship: A team member's domestic partner or a person involved with that team member in a consensual, committed, intimate, or romantic relationship, or a significant business relationship.

Financial Interest: Any actual or future right to an ownership interest, or Investment, including Substantial Investment, compensation, or any other monetary or economic value in connection with a business arrangement, not including a team member's compensation from Target; provided that, in the case of a Financial Interest of a Family Member or a person with whom you have a Close Personal Relationship, team members must have actual knowledge of a Financial Interest for it to be covered by the Conflicts of Interest Policy.

Substantial Investment: Any investment of \$20,000 USD or more of cash or a cash equivalent, or 10% of the outstanding ownership interest with a Vendor, Prospective Vendor or Competitor. Investments include but are not limited to; stocks, stock options, notes, bonds, debt or other "direct interest" securities held by you, a Family Member or a person with whom you have a Close Personal Relationship with.

- **No**
 - Yes, I have knowledge of a Family Member, and/or someone with whom I have a Close Personal Relationship with, who has a Substantial Investment in a Target Vendor, Prospective Vendor or Competitor.

If you answered yes, please advise the following:

Please describe in detail the referenced transaction(s) you negotiated or influenced, and your role in the transaction.

Please describe the Financial Interest.

What is the name of the Family Member/Close Personal Relationship and your relationship to that person (e.g., you, spouse, brother, sister, mother, domestic partner, etc.)?

What is the name of the organization/entity?

Please provide any other information relevant to determine if a conflict of interest may exist.

Question 7

Do you currently hold an elected office or an appointed governmental position with any city, county, state or federal/national government, agency, or other similar authority?

- **No**
 - Yes, I currently hold an elected office or appointed governmental position with a city, county, state, and/or a federal national government, agency, or similar authority.

If you answered yes, please advise the following:

Have you previously received written approval from Government Affairs for your elected or appointed position? If yes, has your role at Target or your governmental position changed since Target last provided approval?

If approval was previously received and nothing has changed since approval was given, proceed to question eight. If you have not previously received approval, please answer the following questions.

What is your elected office or appointed governmental position?

Please describe the nature and scope of your responsibilities in this governmental position.

Does your role at Target require you to interact with government officials or any governmental agency? If yes, please describe the interactions.

What are your job responsibilities with Target? What is the name and location of your Target business unit?

Please provide any other information relevant to determine if a conflict of interest may exist.

Question 8

Do you, or does someone with whom you have a Close Personal Relationship, have a Family Member who is a Government Official that may exercise regulatory oversight over areas that impact or relate to Target in any way?

Target Definitions

Family Member: A team member's spouse, parents, stepparents, children, stepchildren, siblings, mothers- and fathers- in-law, and brothers- and sisters-in-law and in addition to those relatives, anyone (other than tenants or domestic employees) who shares that team member's home.

Close Personal Relationship: A team member's domestic partner or a person involved with that team member in a consensual, committed, intimate, or romantic relationship, or a significant business relationship.

Government Official: Examples include, elected/appointed official, candidate running for office, police officer, customs agent

- **No**

- Yes, I have, or someone with whom I have a Close Personal Relationship has, a Family Member who is a Government Official that may exercise regulatory oversight over areas that impact or relate to Target.

If you answered yes, please advise:

Please provide the name of your Family Member, or the person with whom you have a Close Personal Relationship, who has the connection to the government official, as well as your relationship with that person (e.g., you, your spouse, brother, sister, mother, domestic partner, etc.).

What is the government official's title or position?

What is the name of the governmental body/agency and its geographic location (e.g., city/state/country)?

Does your role at Target allow or require you to interact with the government official and/or agency you provided above?

Please provide any other information relevant to determine if a conflict of interest may exist.

You have a responsibility to report any potential conflicts that either you, or if you suspect another team member has engaged in anything that may appear to conflict with Target's best interests, by emailing Ethics@target.com or using one of the [reporting](#) options. You have the option to report anonymously through the third party Integrity Hotline by phone or using the online web form. In the event that circumstances change over the upcoming year which alters one or more of your responses that could violate the Conflicts of Interest (COI) Policy, you are required to contact Ethics@target.com immediately.

By completing this statement, you are certifying that you:

- Have read, understand, and agree to comply with Target's [Conflicts of Interest Policy](#) and the [Code of Ethics](#) and, to the best of your knowledge, the information you provided is accurate.
- Have made all disclosures and received approvals as required by Target's Conflicts of Interest Policy.
- Understand this is an ongoing acknowledgment, will continue to comply with the Conflicts of Interest policy as amended regularly, and are obligated to update Target on any changes to potential conflicts of interest.

More information on any of the policies listed above can be found on the [Ethics@Target site](#).

Signature

Dated