2021 Responsible Sourcing Report
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Unless otherwise noted, all data included in this report is for the fiscal year ended January 31, 2021.
Our eight core values are the greatest gift our founders gave us four decades ago.

Their philosophy was that if we operated according to these values, the rest would take care of itself. Our founders were right, and we continue to use these values as our guide to do things better every day.

Although a majority of our products are sourced in North America, The Home Depot works with thousands of suppliers and factories around the world to source merchandise for our customers. Through our Responsible Sourcing program, we are able to share our values throughout our entire supply chain to achieve a positive impact. The Home Depot is striving to ensure that the people who make what we sell are treated with respect in a safe and fair workplace, our suppliers benefit from doing the right thing, and our customers in turn receive quality product.

I want to thank our incredible associates and suppliers who have made social and environmental responsibility a top priority. I hope that you find our 2021 Responsible Sourcing Report informative.
Responsible Sourcing Program
The Home Depot
Human Rights Program

Our values of Doing the Right Thing, Respect for All People and Taking Care of Our People are at the center of our Human Rights program. The Home Depot and our subsidiaries respect and support the dignity, well-being and human rights of our associates, the workers in our extended supply chain, the communities in which we live and those affected by our operations.

The Home Depot is committed to respecting internationally recognized human rights. We review and are informed by the United Nations (UN) Guiding Principles on Business and Human Rights, the International Bill of Human Rights, and the International Labour Organization’s (ILO) Declaration on Fundamental Principles and Rights at Work. We recognize that while governments have a duty to protect human rights, companies also have a responsibility to respect human rights. This means addressing the adverse impacts of our global operations.

We believe respecting human rights is of growing importance to our associates, workers, shareholders, investors, customers, consumers and the communities where we operate. There is both a business and moral case for working to ensure that human rights are upheld across our supply chain.

Through contractual arrangements and our Responsible Sourcing program, we require our suppliers to acknowledge and abide by our human rights expectations. All suppliers must agree to our Responsible Sourcing requirements as a condition of doing business with The Home Depot.

There is both a business and moral case for working to ensure that human rights are upheld across our supply chain.
Our Commitments

The Home Depot and its affiliates, divisions and subsidiaries strive to conduct business in a responsible manner. As we expand our business activities and work with suppliers domestically and globally to meet customers’ needs, it is important to maintain our collective commitment to human rights and safety in the workplace.

The Home Depot expects that all suppliers will abide by all applicable international and local laws, rules, and regulations in the manufacture and distribution of merchandise or services provided to The Home Depot. All suppliers are also contractually required to comply with The Home Depot’s Responsible Sourcing Standards, and are strongly encouraged to exceed those standards and promote continuous improvement throughout their operations. All suppliers must be able to demonstrate compliance with these requirements at the request of The Home Depot.

Our Responsible Sourcing Standards establish the requirements that all suppliers must meet in order to conduct business with The Home Depot.
Suppliers must operate in full compliance with all applicable laws and regulations of the countries in which they operate.

Child Labor

Suppliers must not employ workers younger than the greater of 15 years of age – or 14 where the local law allows such exception consistent with International Labour Organization guidelines – or the age for completing compulsory education or the minimum age established by law in the country of manufacture.

In addition, suppliers must comply with all local legal requirements for the work of authorized young workers, particularly those pertaining to hours of work, wages and working conditions.

Forced Labor

Suppliers must not use forced, bonded (including debt bondage) or indentured labor, or prison labor, nor shall suppliers participate in slavery or trafficking of persons. This includes transporting, harboring, recruiting, transferring or receiving persons by means of threat, force, coercion, abduction, or fraud for labor or services.

There shall be no unreasonable restrictions on workers’ freedom of movement in the facility in addition to unreasonable restrictions on entering or exiting company-provided facilities.

As part of the hiring process, workers must be provided with all documents relevant to their employment in a language they understand with a description of terms and conditions of employment prior to the worker departing from his or her country of origin, and there shall be no substitution or change(s) allowed in such documentation upon arrival in the receiving country unless these changes are made to meet local law and provide equal or better terms.

All work must be voluntary, and workers shall be free to terminate their employment. Employers and agents may not hold or otherwise destroy, conceal, confiscate, or deny access by employees to their identity or immigration documents, such as government-issued identification, passports or work permits, unless such holdings are required by law.

Foreign migrant factory workers should not be required to pay employers’ or agents’ recruitment fees or other related fees for the purpose of being hired or as a condition of employment.

Harassment and Abuse

Suppliers must treat all workers with respect and dignity. No worker shall be subject to corporal punishment or physical, sexual, psychological, or verbal harassment or abuse. In addition, suppliers will not use monetary fines as a disciplinary practice.

Compensation

Suppliers must meet or exceed the minimum wage and compensation requirements as defined under applicable labor laws, applicable agreements and local regulations for regular work, overtime work, production rates, and other elements of compensation and employee benefits.

Hours of Work

Suppliers must ensure that, except in extraordinary business circumstances, on a regularly scheduled basis, workers shall not be required to work more than the lesser of (a) sixty (60) hours per week, including overtime or (b) the limits on regular and overtime hours allowed by the law of the country of manufacture. In addition, except in extraordinary business circumstances, all workers shall be entitled to at least one day off in every consecutive seven-day period.

Non-Discrimination

Suppliers will ensure employment – including hiring, salary, benefits, advancement, discipline, termination, retirement, or any other terms and conditions of employment – should be based solely on the person’s ability to perform the job requirements and not the person’s beliefs or any other personal characteristics.

Freedom of Association and Collective Bargaining

Suppliers must recognize and respect the rights of workers to exercise lawful rights of free association, including joining or not joining any association. Suppliers must also respect the legal right of workers to bargain collectively.

Health and Safety

Suppliers must provide a safe and healthy working environment in accordance with applicable laws and regulations.

Environment

Suppliers must comply with all local environmental laws and regulations applicable to the workplace. Factories must conduct business in a manner which minimizes their impact on the environment.

Subcontracting

Suppliers must not use subcontractors in the manufacture of products or product components for The Home Depot without disclosing such information to The Home Depot, and only after the subcontractor has adequately demonstrated compliance with these Responsible Sourcing Standards.
Communication
Suppliers must communicate the provisions of The Home Depot Responsible Sourcing Standards to all workers and supervisors.

Business Ethics
Suppliers will conduct business with The Home Depot consistent with honesty and integrity and demonstrate the highest standards of business ethics. Suppliers will take no actions directed at improperly impacting the results of any audit including presentation of falsified records or coaching of employees. Consistent with The Home Depot Gift and Entertainment policy, suppliers will not offer any incentives to The Home Depot's associates or audit firm representatives.

Monitoring and Compliance
The Home Depot will undertake affirmative measures, such as announced and unannounced on-site audits of production factories, to monitor compliance with these Responsible Sourcing Standards. Suppliers must maintain on site all documentation necessary to demonstrate compliance with the Responsible Sourcing Standards, and suppliers must allow associates and/or representatives from The Home Depot full access to production facilities, worker records, production records and workers for confidential interviews in connection with monitoring visits.

Forced Labor Initiatives
Our Responsible Sourcing Standards are reviewed and updated periodically as we assess the risks faced in our supply chain and determine how to manage those risks. We use a risk-based approach to assess and manage the many aspects of our supply chain oversight and support our efforts to conduct our business in a responsible and ethical manner. Part of this approach is monitoring current trends in the domestic and international labor markets to identify growing risk areas in our supply chain, and updating our standards and audit practices based on those trends.

In early 2019, we updated and expanded our standards with respect to forced labor to better align with standard global practices. We revised our standards to more specifically address practices that can create an environment where labor is forced, even if it appears voluntary on its face. We now provide specific requirements regarding worker’s freedom of movement, supplier hiring practices, a worker’s ability to terminate employment, access to identity or immigration documents, and payment of recruiting fees. In early 2021, we also updated these standards to prohibit all prison labor, removing the provision that previously permitted voluntary prison labor. Our forced labor standards are based on the code of conduct provided by the Responsible Business Alliance (RBA), the world’s largest industry coalition dedicated to corporate social responsibility in global supply chains.

In early 2019, we also joined the RBA’s Responsible Labor Initiative, a multi-industry, multi-stakeholder initiative focused on ensuring that the rights of workers vulnerable to forced labor in global supply chains are consistently respected and promoted.

As a member of the Responsible Labor Initiative, we have access to best practices, tools, partnerships and other resources to better enable us to understand emerging issues, enhance our forced labor due diligence program and assist us in meeting regulatory requirements. These actions enhance and reinforce our oversight program, which includes factory audits that are focused on the areas that we believe pose the greatest risk.

We believe the actions we have taken to address the use of forced labor in the manufacture of products that we sell are appropriate and use a reasonable, risk-based approach to address this aspect of supply chain oversight.
Collaborations

Retail Ethical Sourcing Assessment (RESA)

The Home Depot believes in ensuring our factories meet our requirements. We recognize that many of our partners receive responsible sourcing audits from many other retailers throughout the year.

In 2017, The Home Depot and Lowe’s worked collaboratively to establish and implement a unified audit template for both companies. The goal of this new Retail Ethical Sourcing Assessment (RESA) is to avoid duplication of audits where The Home Depot and Lowe’s are utilizing the same factories. We encourage other retailers to join us in reducing “audit fatigue” by utilizing RESA. RESA’s collaborative approach allows for audit resources to shift and enables our Responsible Sourcing team and factories to dedicate those saved resources to further focus on improvement and compliance-related activities.

In addition to the RESA collaboration, we accept shared audits from our suppliers when they meet certain criteria.

Association of Professional Social Compliance Auditors (APSCA)

Social Compliance Auditing plays a vital role in enabling brands, retailers, producers, and other partners to assess and work towards improvement in labor conditions, including human rights and social issues throughout supply chains. APSCA aims to increase the value and effectiveness of independent social compliance audits by enhancing the professionalism and credibility of individuals and organizations performing them.

All APSCA members are required to sign and abide by a Code of Professional Conduct, which defines their commitments and the responsibilities to which they must adhere and will be held accountable. As a member of the stakeholder board, The Home Depot participates in supporting the development of the program.

In addition, we also require all of our third-party audit partners to be members of APSCA.

Responsible Labor Initiative (RLI)

The Home Depot has joined the Responsible Business Alliance’s Responsible Labor Initiative. The RLI is a multi-industry, multi-stakeholder initiative focused on ensuring that the rights of workers vulnerable to forced labor in global supply chains are consistently respected and promoted.

The Home Depot supports the following Vision and Mission of the RLI:

VISION: The rights and dignity of workers vulnerable to forced labor in global supply chains are consistently respected and promoted through responsible recruitment and employment practices.

MISSION: Members, suppliers, recruitment partners, and stakeholders use their collective influence and application of due diligence to drive the transformation of recruitment markets, reduce the risk of forced labor, and provide remedies in global supply chains at all stages of recruitment and employment.

Responsible Workplace Program

In addition to our membership in the RLI, The Home Depot has partnered with the Responsible Business Alliance Foundation to take part in the Responsible Workplace Program.

The Responsible Business Alliance Foundation and supporting program partner ELEVATE are implementing the Responsible Workplace Program, which aims to transform the market for ethical recruitment practices.

Program Elements Available to Participating Companies Include:

- Forced labor risks and recruitment worker surveys
- Worker-management communication training
- Effective pre-departure orientation training
- Mechanisms to improve workers’ awareness of their labor rights
- Worker helpline and third-party support for migrant workers
Audits

All non-Canada and non-U.S. factories producing private brand and direct import products for The Home Depot are required to receive a Responsible Sourcing audit prior to selling product to The Home Depot. We have the right to audit any factory selling product to The Home Depot.

List of Countries Where Audits Were Performed

Argentina
Austria
Bangladesh
Belgium
Brazil
Cambodia
China
Dominican Republic
Egypt
El Salvador
France
Germany
Guatemala
India
Indonesia
Israel
Italy
Malaysia
Mexico
Netherlands
Pakistan
Peru
Philippines
Portugal
South Korea
Spain
Sri Lanka
Taiwan
Thailand
Turkey
Ukraine
United Kingdom
United States
Vietnam

34 COUNTRIES
1,595 FACTORIES
1,437 AUDITS
1,575 FOLLOW-UP VISITS

Corrective and Preventive Action (CAPA)

The Home Depot believes deficiencies found during an audit should be first reviewed and addressed by the factory management team. We believe it is not only important for the factory to correct the problem, but also to prevent that problem from happening again. To that end, we have developed a comprehensive review and remediation program to address these deficiencies. The Home Depot works with our factory partners to develop strong, actionable plans with reasonable timelines to ensure both corrective and preventive solutions are put in place.

CAPA Verification Program

This program requires additional verification visits after a CAPA plan is approved so that the original auditor can verify corrective and preventive actions have been implemented.

If a factory does not implement the corrective and preventive actions approved in their plan by the expected milestones in the program, The Home Depot may cease all future purchase orders with that factory.
Periodic Re-Audits

Factories will be subjected to periodic audits based on the results of the previous audit. The timing of periodic audits based on the previous audit result may be as follows.

- **Grade A**: Two (2) years from the CAPA closure¹
- **Grade B**: One (1) year from the CAPA closure
- **Grade C**: Six (6) months from the CAPA closure¹
- **Grade F**: Factory is required to undertake the Transparency Improvement Program (TIP)². New audit required six (6) months from the date of the audit. At that time, the factory is expected to achieve a grade C or higher.

¹ THD reserves the right to audit more frequently at its discretion.
² See ELEVATE partnership section of this report.

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**The Home Depot Audit Process**

**Diagram A**

**Periodic Re-Audits**

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¹ THD reserves the right to audit more frequently at its discretion.
² See ELEVATE partnership section of this report.
TIP is a factory-specific program unique to The Home Depot that is designed to support sustainable improvement for factories with recurrent and/or heightened issues. TIP was designed and is implemented by our third-party partner ELEVATE, a leading third-party business risk and sustainability solutions provider.

TIP is a six-month program designed to reinforce the need for transparency and provide factories with the opportunity and support needed to develop and implement management systems in a practical way and within reasonable time frames.

When serious issues are identified in a factory, The Home Depot also works with the supplier to understand what went wrong and provides guidance on how to improve their systems for managing factory compliance. We partner with ELEVATE to use their SCOPE gap analysis to evaluate program effectiveness.

** SCOPE and TIP Implementation Since Program Inception **

- 54 SCOPE Since 2011
- 340 TIP Baseline Visits Since 2008
- 657 TIP Support Visits Since 2008
Training and Communication

The Home Depot believes that through sufficient and effective communication, we can best partner with our suppliers and their factories to achieve our mutual goals. In 2020, we:

- Continued to update subcontractor clarification materials which provide real examples to our vendors’ tools and judgment criteria for a variety of scenarios.
- Continued to enhance our child/underage labor program.
- Updated the Responsible Sourcing Supplier Manual with enhanced policies and procedures.
- Updated forced labor policy with additional guidance.

The Home Depot continues to get closer to business partners via our online training system which provides an alternative solution for remote learning and helps our suppliers understand the Responsible Sourcing processes and policies, no matter where they are located. As a result, we have seen a significant shift by our vendors and factories in the utilization of the online and virtual training instead of the face-to-face classes.

In 2020, we enhanced the online training program by:

- Continuing to require that all new suppliers and factories undertake the training and present their certificate of completion at the time of their next audit. We believe this is driving better factory performance in our RS audits.
- Continuing to post the real-time seminar calendar online to give suppliers and factories the flexibility to register and join the training which fits their schedule and location.
- Setting up virtual training for the RS seminar to give suppliers and factories the flexibility to join the training during the pandemic.

Our online training program also has an “ask question” function so the Responsible Sourcing team can provide timely responses to the suppliers’ and factories’ questions.

We are committed to being transparent with our partners and to helping them understand our expectations so that they in turn will be transparent with us.

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The Home Depot Responsible Sourcing team developed digital country law guides for 14 key countries of expansion outside of China to support the global supply chain migration we have seen in 2020. Each of these 14 guides contains a comparison to the corresponding Chinese laws related to our Responsible Sourcing Standards.

These guides provide our China-based Responsible Sourcing team with additional tools to better understand the varying legal requirements across key nations where our supply chain has expanded. The team has also utilized this tool to educate our internal and external partners. This includes monthly workshops with our global sourcing teams to ensure they understand how these requirements differ in each country and what they should look for when conducting their own due diligence of new supply chain partners.

The following graphics illustrate the types of information contained in the guides at the time of publication.
Conflict Minerals + Ethical Accountability
The Home Depot is committed to the responsible sourcing of materials for our products, and we expect that our suppliers are likewise committed to responsible sourcing.

Our Expectations
We expect all suppliers manufacturing our products to partner with us to provide appropriate information and conduct necessary due diligence in order to facilitate our compliance with the conflict minerals law. We further expect all suppliers manufacturing our products to adopt sourcing practices to obtain products and materials from suppliers not involved in funding conflict in the Democratic Republic of the Congo and adjoining countries.

Our Partnerships
We partnered with our private brands and proprietary suppliers whose custom products contain Tin, Tungsten, Tantalum or Gold (3TG) to identify the source of any 3TG in the supply chain.

Through our due diligence process, which aligns with due diligence guidance from the Organization for Economic Co-Operation and Development (OECD), we received 100% participation from our in-scope private brands and proprietary Tier 1 suppliers for the calendar year ended December 31, 2020.

We continue to work closely with our suppliers to ensure that they implement responsible sourcing and encourage their smelters to obtain a “conflict-free” designation from an independent third-party auditor.

Promoting a Culture of Ethical Accountability
We provide ways for our suppliers, factory workers and service providers to report concerns when they think our Home Depot Responsible Sourcing Standards, values or compliance with the law may be compromised.

Anonymous Reports
Workers in all countries where we source goods may submit anonymous reports via www.THDsupplieralertline.com

Supplier AlertLine
Supplier AlertLine is answered by a live operator 24/7 in these countries:

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<tr>
<th>Country</th>
<th>Number</th>
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<tbody>
<tr>
<td>U.S. and Canada</td>
<td>1-800-435-3152</td>
</tr>
<tr>
<td>Mexico</td>
<td>001-888-765-8153</td>
</tr>
<tr>
<td>China</td>
<td>86-400-880-1045</td>
</tr>
<tr>
<td>India</td>
<td>(Direct Access) 000-117, then (Dial) 800-435-3125</td>
</tr>
<tr>
<td>Vietnam</td>
<td>(Access Code) 1-201-0288, then (Dial) 800-435-3152</td>
</tr>
</tbody>
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We report this data as of the calendar year ended December 31, 2021, consistent with U.S. Securities and Exchange Commission rules.

*Of the 49 SORs with an indication of sourcing in the covered countries, 49 were certified as DRC Conflict Free by either the Responsible Minerals Initiative, the London Bullion Market Association and/or the Responsible Jewelry Council.
Todd Nash joined The Home Depot in January 2011 as the Director of Responsible Sourcing. Prior to joining The Home Depot, Todd led the Global Product Compliance team at Amazon.com, was responsible for regulatory compliance at West Marine and partnered with multiple U.S. government agencies as a consultant with Booz Allen & Hamilton.

A native of Rhode Island, Todd holds a B.A. degree in Political Science and English from the University of Rhode Island. Todd also received his master’s degree in Public Administration from the Maxwell School of Citizenship and Public Affairs at Syracuse University.

Cathy Cao joined the Responsible Sourcing team as Senior Manager in November 2014. She is responsible for managing the Asia Responsible Sourcing team to drive and implement the company’s global strategy throughout The Home Depot and supply chain partners. Cathy also leads the team to work closely with our third-party audit firm partners to ensure they are meeting our service level expectations and collaborates with multi-functional teams throughout The Home Depot to support the overall global sourcing business.

Prior to joining the Responsible Sourcing team, Cathy was the Supplier Quality Engineer (SQE) and led the SQE team of multiple categories in The Home Depot Asia Sourcing Office (ASO); was responsible for quality assurance at H.E.F. Group; and was a Radio Frequency Testing Engineer at Lucent Technologies.

Cathy holds a B.A. degree in English from the Shanghai International Studies University.
Weina Li joined The Home Depot in June 2012 as Assistant Manager of Responsible Sourcing and was promoted to Responsible Sourcing Manager in April 2014. She is responsible for supporting the Responsible Sourcing Senior Manager to manage the daily operation of the Responsible Sourcing team in Shenzhen and works closely with the third-party service provider for Responsible Sourcing audit-reporting system maintenance and enhancement. Weina also supports the Responsible Sourcing Senior Manager on Responsible Sourcing SOP enhancement and project management.

Prior to joining The Home Depot, Weina worked at PCH International as Senior Compliance Officer for four years and as Senior Account Manager and Auditor of System Auditing at TUV Rheinland Shenzhen Co., Ltd. for five years.

Weina holds a master’s degree in Business Administration from the Renmin University of China.

Tammy Nguyen joined The Home Depot in June 2020 as a Responsible Sourcing Senior Specialist. She works together with other team members to implement the Responsible Sourcing process, drive Responsible Sourcing management system development in our Southeast Asia supply chain, and build Responsible Sourcing competence internally and externally to support the business growth in the THD Vietnam Sourcing Office. Tammy also is responsible for conducting factory audits and coordinating with functional teams in the Vietnam Sourcing Office.

Prior to joining The Home Depot, Tammy worked for The Children’s Place as a Responsible Sourcing Specialist in charge of the Vietnam and Cambodia markets.

Samantha Li joined THD in September 2013 as Responsible Sourcing Senior Specialist. She works closely with the Responsible Sourcing ASO team and related Global Sourcing cross-functional teams in charge of all Responsible Sourcing issues for the kitchen and bath, indoor garden, and building material departments and The Home Depot Pro. Samantha has 15 years of working experience in social compliance and QA auditing.

Prior to joining The Home Depot, Samantha worked as a Senior Assessor in PVH. Before that, she also worked as Social Compliance Specialist in Knothe Apparel Group SHA.

Samantha holds a bachelor’s degree in Business Administration from the University of International Business & Economy in Beijing.

Jason Song joined The Home Depot in March 2017 as Responsible Sourcing Specialist. He is responsible for The Home Depot Responsible Sourcing program service provider and supplier monitoring processes for the electrical and outdoor garden departments. Jason is also responsible for conducting factory audits and coordinating with functional teams in the Asia Sourcing Shenzhen Office.

Prior to joining The Home Depot, Jason worked as Social Compliance Auditor at UL for three years. He is an SA8000 and ISO 9001-certified auditor.

Jason holds a bachelor’s degree of Applied Chemistry from the Beijing Institute of Technology, Zhuhai Institute.

Moon Gao joined The Home Depot in October 2018 as Responsible Sourcing Specialist. Before joining The Home Depot, Moon worked as the Sustainability Department Director in Nanjing for Unique International Trading Company, where she was responsible for all related compliance work. In addition, Moon spent two years with UL as a Social Compliance Auditor working with multiple suppliers and brands.

Moon received her bachelor’s degree in Chemical Technology and Engineering and minor certificate in Business Administration from Shanghai University.

Moon also holds a master’s degree in Chemical Engineering from Shanghai University.
Feit Electric appreciates the opportunity to partner closely with Home Depot’s Responsible Sourcing Team.

Together, we’ve educated our factories on best practices aligned with The Home Depot Retail Ethical Sourcing Assessment protocols so our employees operate in a safe and healthy working environment where they are treated with decency, dignity and respect. Our requirement to “Do the Right Thing” by workers is now broadly recognized as a good business practice throughout our supply chain. It has been extremely gratifying helping to build something systemically positive, sustainable and contagious with the potential to create a lasting impact on people’s lives.

— Alan Feit

Alan Feit (Right) – President
Brian Halliwell (Left) – Vice President