

Company Name Amazon
Industry Agricultural, Apparel & ICT Products (Supply Chain only)
UNGP Core Score (*) 6.0 out of 26

Score	Out of	For indicators
Governance and Policy Commitments		
1	2	A.1.1 Commitment to respect human rights
0.5	2	A.1.2 Commitment to respect the human rights of workers
1	2	A.1.4 Commitment to engage with stakeholders
0	2	A.1.5 Commitment to remedy
Embedding respect and Human Rights Due Diligence		
Embedding respect		
0.5	2	B.1.1 Embedding - Responsibility and resources for day-to-day human rights functions
Human Rights Due Diligence (HRDD)		
0.5	2	B.2.1 HRDD - Identifying: Processes and triggers for identifying human rights risks and impacts
0	2	B.2.2 HRDD - Assessing: Assessment of risks and impacts identified (salient risks and key industry risks)
1	2	B.2.3 HRDD - Integrating and Acting: Integrating assessment findings internally and taking appropriate action
0	2	B.2.4 HRDD - Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts
0	2	B.2.5 HRDD - Reporting: Accounting for how human rights impacts are addressed
Remedies and Grievance Mechanisms		
1.5	2	C.1 Grievance channels/mechanisms to receive complaints or concerns from workers
0	2	C.2 Grievance channels/mechanisms to receive complaints or concerns from external individuals and communities
0	2	C.7 Remedying adverse impacts and incorporating lessons learned
6.0	26	

(*) Instead of the full list of indicators in the 2020 CHRB Methodology, this year's assessment uses the CHRB Core UNGP Indicators. These are 13 non-industry specific indicators that focus on three key areas of the UNGPs: high level commitments, human rights due diligence and access to remedy.

The 13 indicators selected from the full CHRB Methodology are scored on a simple unweighted basis, with a maximum of 2 points for each indicator for a maximum total of 26 points.

In addition, allegations of severe human rights impacts (Measurement Theme E) were also assessed but do not impact overall final scores

Please note that the "Not met" labels in the Explanation boxes below do not necessarily mean that the company does not meet the requirements as they are described in the bullet point short text. Rather, it means that the analysts could not find information *in public sources* that met the requirements *as described in full* in the CHRB 2020 Methodology document. For example, a "Not met" under "General HRs Commitment", which is the first bullet point for indicator A.1.1, does not necessarily mean that the company does not have a general commitment to human rights. Rather, it means that the CHRB could not identify a public statement of policy in which the company commits to respecting human rights.

Detailed assessment

Governance and Policies

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1.1	Commitment to respect human rights	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: General HRs commitment: The Company states in its Global Human Rights Policy that it 'recognizes our responsibility to respect and uphold internationally recognized human rights through the ethical treatment of our workforce and those within our value chain. Guided by the United Nations Guiding Principles on Business and Human Rights, we commit to embedding respect for human rights throughout our business.' However, 'to recognize the responsibility' or 'to commit to embedding' are not considered a formal commitment following CHRB wording criteria. [Global Human Rights Principles, N/A: sustainability.aboutamazon.com] • Not met: UNGC principles 1 & 2 • Met: UDHR: In addition, the Company indicates: 'Our approach on human rights is informed by international standards; we respect and support the Core Conventions of the International Labour Organization (ILO), the ILO Declaration on Fundamental Principles and Rights at Work, and the UN Universal Declaration of Human Rights'. [Global Human Rights Principles, N/A: sustainability.aboutamazon.com] • Not met: International Bill of Rights <p>Score 2</p> <ul style="list-style-type: none"> • Not met: UNGPs: As indicated above, in its Global Human Rights Policy, the Company states: 'Guided by the United Nations Guiding Principles on Business and Human Rights, we commit to embedding respect for human rights throughout our business.' However, 'to be guided by' is not considered a formal commitment following CHRB wording criteria. [Global Human Rights Principles, N/A: sustainability.aboutamazon.com] • Not met: OECD
A.1.2	Commitment to respect the human rights of workers	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: ILO Core: The Company states in its Global Human Rights Policy: '[...] we respect and support the Core Conventions of the International Labour Organization (ILO), the ILO Declaration on Fundamental Principles and Rights at Work, [...]' [Global Human Rights Principles, N/A: sustainability.aboutamazon.com] • Not met: Explicitly list All four ILO for AG suppliers: In its Supply Chain Standards, the Company includes provisions related to the ILO Core, including: 'Amazon does not tolerate the use of child labor. [...] Amazon suppliers must not use forced labor—slave, prison, indentured, bonded, or otherwise. [...] Amazon suppliers must not discriminate [...]. Amazon expects that our suppliers respect the rights of workers to establish and join an organization of their own selection. Workers must not be penalized or subjected to harassment or intimidation for the non-violent exercise of their right to join or refrain from joining such legal organizations.' However, no reference found to collective bargaining. <p>Its Supplier Code of Conduct includes the following provisions: 'Amazon will not tolerate the use of child labor. [...] Our suppliers must not use forced labor - slave, prison, indentured, bonded, or otherwise. [...] Our suppliers must not discriminate on the basis of race, color, national origin, gender, [...] or similar factors in hiring and working practices such as job applications, promotions, job assignments, training, wages, [...] Our suppliers must respect the rights of workers to establish and join a legal organization of their own selection. Workers must not be penalized or subjected to harassment or intimidation for the non-violent exercise of their right to join or refrain from joining such legal organizations.' However, CHRB could not find a provision related with collective bargaining. [Supply Chain Standards, 2019: d39w7f4ix9f5s9.cloudfront.net]</p>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not met: Explicitly list ALL four ILO for AP suppliers: As above [Supply Chain Standards, 2019: d39w7f4ix9f5s9.cloudfront.net] • Not met: Explicitly list ALL four ILO for ICT suppliers: As above [Supply Chain Standards, 2019: d39w7f4ix9f5s9.cloudfront.net] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Explicit commitment to All four ILO Core: According to its Global Human Rights Policy, the Company does 'not tolerate discrimination' [...] and does 'not tolerate the use of child labor, forced labor, or human trafficking in any form [...]'. With respect freedom of association it states: 'We respect freedom of association and our employees' right to join, form, or not to join a labor union or other lawful organization of their own selection, without fear of reprisal, intimidation, or harassment.' However, no commitment found to collective bargaining in this policy nor in its Code of Business Conduct. [Global Human Rights Principles, N/A: sustainability.aboutamazon.com & Code of Business and Ethics - Website, N/A: ir.aboutamazon.com] • Met: Respect H&S of workers: The Company indicates that it 'provides a clean, safe and healthy work environment'. [Code of Business and Ethics - Website, N/A: ir.aboutamazon.com] • Met: H&S applies to AG suppliers: Its Supply Chain Standards reads: 'Amazon expects our suppliers to provide workers with a safe and healthy work environment.' [Supply Chain Standards, 2019: d39w7f4ix9f5s9.cloudfront.net] • Met: H&S applies to AP suppliers: Its Supply Chain Standards reads: 'Amazon expects our suppliers to provide workers with a safe and healthy work environment.' [Supply Chain Standards, 2019: d39w7f4ix9f5s9.cloudfront.net] • Not met: working hours for workers [Code of Business and Ethics - Website, N/A: ir.aboutamazon.com] • Not met: Working hours for AP suppliers: With respect working hours, its Supplier Code indicates: 'Amazon expects suppliers to regularly monitor working hours to ensure the safety, health, and welfare of workers. Except in special or emergency situations, (i) suppliers are required to limit working hours to no more than 60 hours per week, including overtime, and (ii) each worker must be entitled to at least one day off for every seven-day work period. In all circumstances, working hours must not exceed the maximum amount permitted by law.' However, no evidence found of references to standard weekly hours or the Company explicitly committing to respect ILO conventions on working hours. [Supply Chain Standards, 2019: d39w7f4ix9f5s9.cloudfront.net] • Met: H&S applies to ICT suppliers: Its Supply Chain Standards reads: 'Amazon expects our suppliers to provide workers with a safe and healthy work environment.' [Supply Chain Standards, 2019: d39w7f4ix9f5s9.cloudfront.net] • Not met: working hours for workers • Not met: Working hours for ICT suppliers: With respect working hours, its Supplier Code indicates: 'Amazon expects suppliers to regularly monitor working hours to ensure the safety, health, and welfare of workers. Except in special or emergency situations, (i) suppliers are required to limit working hours to no more than 60 hours per week, including overtime, and (ii) each worker must be entitled to at least one day off for every seven-day work period. In all circumstances, working hours must not exceed the maximum amount permitted by law.' However, no evidence found of references to standard weekly hours or the Company explicitly committing to respect ILO conventions on working hours. [Supply Chain Standards, 2019: d39w7f4ix9f5s9.cloudfront.net]
A.1.4	Commitment to engage with stakeholders	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Regular stakeholder engagement: The Company reports in its Modern Day Slavery Statement 2018 that it conducts assessments on its suppliers, including 'Confidential worker interviews or surveys conducted without site management present. [...] To ensure that our policies and programs incorporate internationally recognized human rights standards, we conduct formal benchmarking with industry and multilateral groups to design, operate, and continually improve our risk assessment and audit program.' [Modern Day Slavery Statement 2018, 2018: m.media-amazon.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Commits to engage stakeholders in design • Not met: Regular stakeholder design engagement
A.1.5	Commitment to remedy	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Commits to remedy: The Company states in its Global Human Rights: 'We are committed to providing our employees with appropriate access to grievance mechanisms and remedial action.' However, the commitment is focused

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>on employees, there is no reference to other individuals or communities. In its Modern Day Slavery Statement, the Company indicates: 'Audit reports and findings are reviewed regularly by senior leadership and corrective action plans are implemented as needed. Amazon tracks remediation closely and conducts follow-up audits for significant issues. Between audits, Amazon employees meet on-site with supplier managers to discuss open issues and remediation progress.' However, no evidence found of a statement of policy where the Company commits to remedy the adverse impacts on individuals, workers and communities that it has caused or contributed to. The information included in its Modern Say Slavery Statement seems to be focused exclusively on corrective measures to face non-compliances found in audits. [Modern Day Slavery Statement (website), N/A: amazon.co.uk & Global Human Rights Principles, N/A: sustainability.aboutamazon.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Not obstructing access to other remedies • Not met: Collaborating with other remedy initiatives • Not met: Work with AG suppliers to remedy impacts: The Company also states that its 'Suppliers are required to remediate violations of Amazon's Supplier Code of Conduct. Suppliers must submit a Corrective Action Plan (CAP) providing both a root cause analysis and a description of remedy. Amazon evaluates CAPs in light of the severity level of the violation'. In addition, in its Sustainability Report, the Company indicates: 'when violations of our standards occur, we are committed to working with our suppliers to remedy any issues. When violations are identified, suppliers must develop a corrective action plan that details immediate actions to address high-risk issues, and a long-term plan to prevent issues from reoccurring. Where suppliers fail to meet our standards or refuse to make progress on remediating issues, we may choose to terminate the relationship'. However, it is not clear if the how the Company is committed to actually work with them to remedy impacts either through suppliers' mechanisms or through the development of third party non-judicial remedies. [Modern Day Slavery Statement (website), N/A: amazon.co.uk & Sustainability Report, 06/2020: sustainability.aboutamazon.com] • Not met: Work with AP suppliers to remedy impacts: The Company also states that its 'Suppliers are required to remediate violations of Amazon's Supplier Code of Conduct. Suppliers must submit a Corrective Action Plan (CAP) providing both a root cause analysis and a description of remedy. Amazon evaluates CAPs in light of the severity level of the violation'. In addition, in its Sustainability Report, the Company indicates: 'when violations of our standards occur, we are committed to working with our suppliers to remedy any issues. When violations are identified, suppliers must develop a corrective action plan that details immediate actions to address high-risk issues, and a long-term plan to prevent issues from reoccurring. Where suppliers fail to meet our standards or refuse to make progress on remediating issues, we may choose to terminate the relationship'. However, it is not clear if the how the Company is committed to actually work with them to remedy impacts either through suppliers' mechanisms or through the development of third party non-judicial remedies. [Modern Day Slavery Statement (website), N/A: amazon.co.uk & Sustainability Report, 06/2020: sustainability.aboutamazon.com] • Not met: Work with ICT suppliers to remedy impacts: The Company also states that its 'Suppliers are required to remediate violations of Amazon's Supplier Code of Conduct. Suppliers must submit a Corrective Action Plan (CAP) providing both a root cause analysis and a description of remedy. Amazon evaluates CAPs in light of the severity level of the violation'. In addition, in its Sustainability Report, the Company indicates: 'when violations of our standards occur, we are committed to working with our suppliers to remedy any issues. When violations are identified, suppliers must develop a corrective action plan that details immediate actions to address high-risk issues, and a long-term plan to prevent issues from reoccurring. Where suppliers fail to meet our standards or refuse to make progress on remediating issues, we may choose to terminate the relationship'. However, it is not clear if the how the Company is committed to actually work with them to remedy impacts either through suppliers' mechanisms or through the development of third party non-judicial remedies. [Modern Day Slavery Statement (website), N/A: amazon.co.uk & Sustainability Report, 06/2020: sustainability.aboutamazon.com]

Embedding Respect and Human Rights Due Diligence

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.1	Responsibility and resources for day-to-day human rights functions	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Commits to ILO core conventions: See indicator A.1.2. The Company is committed to conventions of ILO Declaration. • Not met: Senior responsibility for HR <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Day-to-day responsibility: On its website, the Company reports: 'Our global security operations team has immediate response protocols in the event of a suspected human trafficking related issue, regardless of where the issue arises. [...] Our social responsibility team regularly reviews and updates Amazon's human trafficking prevention policies and updates executive leadership on our progress on human trafficking prevention initiatives throughout the year'. However, no details found regarding to which senior manager, senior management body, the responsibility for human rights is allocated. [Training on human trafficking, N/A: sustainability.aboutamazon.com] • Met: Day-to-day responsibility for AG in supply chain: The Company states in its MSA: 'Amazon's sourcing teams have each taken on Social Responsibility goals to monitor for these conditions at an executive leadership level; performance against these goals is regularly reported to leadership. The Social Responsibility team consults with Amazon business teams on new sourcing geographies and sourcing teams are responsible for reviewing supplier performance before moving to production.' [Modern Day Slavery Statement (website), N/A: amazon.co.uk] • Met: Day-to-day responsibility for AP in supply chain: The Company states in its MSA: 'Amazon's sourcing teams have each taken on Social Responsibility goals to monitor for these conditions at an executive leadership level; performance against these goals is regularly reported to leadership. The Social Responsibility team consults with Amazon business teams on new sourcing geographies and sourcing teams are responsible for reviewing supplier performance before moving to production.' [Modern Day Slavery Statement (website), N/A: amazon.co.uk] • Met: Day-to-day responsibility for ICT in supply chain: The Company states in its MSA: 'Amazon's sourcing teams have each taken on Social Responsibility goals to monitor for these conditions at an executive leadership level; performance against these goals is regularly reported to leadership. The Social Responsibility team consults with Amazon business teams on new sourcing geographies and sourcing teams are responsible for reviewing supplier performance before moving to production.' [Modern Day Slavery Statement (website), N/A: amazon.co.uk]
B.2.1	Identifying: Processes and triggers for identifying human rights risks and impacts	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Identifying risks in own operations: The Company indicates in its MDSS document that it uses 'a combination of desk-based research, supply chain mapping against existing human rights indices, as well as internal and industry audit results to analyse the risk of modern slavery in our supply chain and operations. While modern slavery can be found in all countries and industries, we acknowledge that there is a heightened risk with: domestic and international migrant labour; contract, agency, and temporary workers; vulnerable populations (e.g. refugees); and young, or student workers. In addition to the controls listed below, this year Amazon launched a process to investigate suppliers with a heightened risk of modern slavery specifically in relation to migrant workers. Our process focuses on listening to workers' perspectives about their recruitment experience and working/living conditions, and relating anonymous feedback from workers directly to management to drive improvement. In addition, we are expanding regional teams to engage with suppliers in high-risk regions, and working with industry programmes, such the Responsible Workplace Program currently operating in Malaysia.' However, evidence seems to focus in determining the level of risk related to modern slavery rather than a process to identify which are the human rights issues and impacts that it faces (the Company acknowledges modern slavery risk and explain how it assesses it). [Modern Day Slavery Statement (website), N/A: amazon.co.uk] • Not met: Identifying risks in AG suppliers: Evidence included above refers to manufacturing supply chain. [Modern Day Slavery Statement (website), N/A: amazon.co.uk]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not met: Identifying risks in AP suppliers: As indicated above, the Company's human rights risk assessment covers its supply chain. However, evidence refers to determining modern slavery risks in its supply chains. No evidence found of a process to identify which are the human rights issues that it may face (in addition to modern slavery, which is already identified in the evidence provided). [Modern Day Slavery Statement (website), N/A: amazon.co.uk] • Not met: Identifying risks in ICT suppliers: As indicated above, the Company's human rights risk assessment covers its supply chain. However, evidence refers to determining modern slavery risks in its supply chains. No evidence found of a process to identify which are the human rights issues that it may face (in addition to modern slavery, which is already identified in the evidence provided). [Modern Day Slavery Statement (website), N/A: amazon.co.uk] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Ongoing global risk identification: As indicated above, evidence refers to assessing modern slavery risk, rather than an ongoing process to identify which the Company's potential human rights risks and impacts. [Modern Day Slavery Statement (website), N/A: amazon.co.uk] • Met: In consultation with stakeholders: The Company states that, 'In addition to the controls listed below, this year Amazon launched a process to investigate suppliers with a heightened risk of modern slavery specifically in relation to migrant workers. Our process focuses on listening to workers' perspectives about their recruitment experience and working/living conditions, and relating anonymous feedback from workers directly to management to drive improvement. [Modern Day Slavery Statement (website), N/A: amazon.co.uk] • Not met: In consultation with HR experts: The Company indicates that 'In addition [to a process to investigate suppliers with a heightened risk of modern slavery], we are expanding regional teams to engage with suppliers in high-risk regions, and working with industry programmes, such the Responsible Workplace Program currently operating in Malaysia'. However, it no evidence found of the Company working with human rights experts in the process of identifying risks. [Modern Day Slavery Statement (website), N/A: amazon.co.uk] • Not met: Triggered by new circumstances • Not met: Explains use of HRIAs or ESIA (inc HR)
B.2.2	Assessing: Assessment of risks and impacts identified (salient risks and key industry risks)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Salient risk assessment (and context) • Not met: Public disclosure of salient risks: The Company discloses information about its Risks Factors in its Annual Report. However, no evidence found of its salient human rights issues assessed as part of a human rights due diligence process. [Annual Report 2018, 01/2019: s2.q4cdn.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met
B.2.3	Integrating and Acting: Integrating assessment findings internally and taking appropriate action	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Action Plans to mitigate risks: The Company states that it trains its suppliers on the standards and conduct required, and that if there are any issues, supplier must provide a detailed corrective action plans. It also engages with suppliers offering training 'Amazon recognizes our responsibility to ensure the well-being of factory workers manufacturing products for Amazon. Beyond regular factory audits and assessments, we are continuously testing new ways to improve worker well-being.' However, no evidence found of a global system to take action to prevent, mitigate or remediate the salient human rights issues assessed'. Evidence seems to focus in modern slavery risks. [Sustainability Question Bank, N/A: blog.aboutamazon.com & Modern Day Slavery Statement (website), N/A: amazon.co.uk] • Not met: Including in AG supply chain: Evidence seems to refer to manufacturing process, no details found on agricultural supply chain. [Modern Day Slavery Statement (website), N/A: amazon.co.uk] • Not met: Including in AP supply chain: Example of actions decided refers to manufacturing supply chain. However, no evidence found of a global system to take action to prevent or mitigate the different salient human rights issues (evidence seems to focus in slavery-related issues). This indicator only applies in case the Company meets 'Action plans to mitigate risks'. [Modern Day Slavery Statement (website), N/A: amazon.co.uk]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not met: Including in ICT supply chain: Example of actions decided refers to manufacturing supply chain. However, no evidence found of a global system to take action to prevent or mitigate the different salient human rights issues (evidence seems to focus in slavery-related issues). [Sustainability Question Bank, N/A: blog.aboutamazon.com & Modern Day Slavery Statement (website), N/A: amazon.co.uk] • Met: Example of Actions decided: The Company indicates that it trains suppliers on the standards and conduct required by the supplier code. In addition, in the context of modern slavery, it states: 'we have dedicated teams that work directly with suppliers and service providers in major geographies. We offer on-site and remote training to support continuous improvement. Suppliers are also encouraged to participate in external training programs, such as industry association tutorials related to recognizing and preventing forced labor, compliance with wage and working hours requirement and implementing management systems. We are continuously exploring ways to use Amazon's expertise to expand this support and reach more suppliers. Amazon recognizes our responsibility to ensure the well-being of factory workers manufacturing products for Amazon. Beyond regular factory audits and assessments, we are continuously testing new ways to improve worker well being. [Sustainability Question Bank, N/A: blog.aboutamazon.com & Modern Day Slavery Statement (website), N/A: amazon.co.uk] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met
B.2.4	Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: System to check if Actions are effective • Not met: Lessons learnt from checking effectiveness <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirement under score 1 met
B.2.5	Communicating : Accounting for how human rights impacts are addressed	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Comms plan re identifying risks: In order to be awarded this indicator, the Company needs to achieve at least 1,5 points in B.2.1 • Not met: Comms plan re assessing risks: In order to be awarded this indicator, the Company has to achieve a full score in B.2.3 • Not met: Comms plan re action plans for risks: In order to be awarded this indicator, the Company has to achieve a full score in B.2.3 • Not met: Comms plan re reviewing action plans • Not met: Including AG suppliers: In order to be awarded this indicator, the Company has to achieve a full score in B.2.2/B.2.3/B.2.4 and at least 1,5 points in B.2.1 • Not met: Including AP suppliers: In order to be awarded this indicator, the Company has to achieve a full score in B.2.2/B.2.3/B.2.4 and at least 1,5 points in B.2.1 • Not met: Including ICT suppliers: In order to be awarded this indicator, the Company has to achieve a full score in B.2.2/B.2.3/B.2.4 and at least 1,5 points in B.2.1 <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Responding to affected stakeholders concerns: The Company provided information to CHRB in relation to this indicator, but it was not material. • Not met: Ensuring affected stakeholders can access communications

Remedies and Grievance Mechanisms

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.1	Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Channel accessible to all workers: The Company states in its Code of Business Conduct the following: 'The Amazon.com Legal Department has developed and maintains reporting guidelines for employees who wish to report violations of the Code of Conduct. These guidelines include information on making reports to the Legal Department and to an independent third party.' In addition, the Company indicates on its website, that it has an Open-Door Policy: '24/7 – Hours in a day, days in a week in which an associate is able to provide direct feedback to their manager, their general manager, and even the CEO [...]' [Code of Business and Ethics - Website, N/A: ir.aboutamazon.com & Safety, N/A: aboutamazon.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Number grievances filed, addressed or resolved • Not met: Channel is available in all appropriate languages • Met: Expect AG supplier to have equivalent grievance systems: In its Supply Chain Standards, the Company indicates that it 'expects suppliers to protect worker whistleblower confidentiality and prohibit retaliation against workers who report workplace grievances. Suppliers are required to create a mechanism for workers to submit their grievances in a confidential and anonymous manner and maintain an effective process to investigate and address worker concerns. Workers employed by subcontractors must have a mechanism in place to bring their concerns to management teams above the subcontractor.' [Supply Chain Standards, 2019: d39w7f4ix9f5s9.cloudfront.net] • Met: Expect AP supplier to have equivalent grievance systems: In its Supply Chain Standards, the Company indicates that it 'expects suppliers to protect worker whistleblower confidentiality and prohibit retaliation against workers who report workplace grievances. Suppliers are required to create a mechanism for workers to submit their grievances in a confidential and anonymous manner and maintain an effective process to investigate and address worker concerns. Workers employed by subcontractors must have a mechanism in place to bring their concerns to management teams above the subcontractor.' [Supply Chain Standards, 2019: d39w7f4ix9f5s9.cloudfront.net] • Met: Expect ICT supplier to have equivalent grievance systems: In its Supply Chain Standards, the Company indicates that it 'expects suppliers to protect worker whistleblower confidentiality and prohibit retaliation against workers who report workplace grievances. Suppliers are required to create a mechanism for workers to submit their grievances in a confidential and anonymous manner and maintain an effective process to investigate and address worker concerns. Workers employed by subcontractors must have a mechanism in place to bring their concerns to management teams above the subcontractor.' [Supply Chain Standards, 2019: d39w7f4ix9f5s9.cloudfront.net]
C.2	Grievance channel(s)/mechanism(s) to receive complaints or concerns from external individuals and communities	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Grievance mechanism for community: Although the Company provides information where different media sites report that the Company's CEO reads messages and complaints from customers, no evidence found describing a grievance mechanism/channel with a clear process, available to external stakeholders, further than customers. [NY Times - Chief message to employees, 17/08/2015: nytimes.com & Inc - Email single character, 23/04/2018: inc.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Describes accessibility and local languages • Not met: Expects AG supplier to have community grievance systems • Not met: AG supplier communities use global system • Not met: Expects AP supplier to have community grievance systems • Not met: AP supplier communities use global system • Not met: Expects ICT supplier to have community grievance systems • Not met: ICT supplier communities use global system
C.7	Remedying adverse impacts and incorporating lessons learned	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Describes how remedy has been provided • Not met: Says how it would remedy key sector risks <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Changes introduced to stop repetition • Not met: Approach to learning from incident to prevent future impacts • Not met: Evaluation of the channel/mechanism

Performance: Responses to Serious Allegations (Not included in the overall score)

Indicator Code	Indicator name	Score (out of 2)	Explanation
E(1).0	Serious allegation No 1		<ul style="list-style-type: none"> • Headline: Foxconn accused by China Labour Watch of non-respect of working conditions • Area: Working hours • Story: China Labor Watch (CLW) published the report of investigation it conducted at Hengyang Foxconn, a unit of Hon Hai Precision Industry Co., Ltd. (Foxconn). The factory manufactures Amazon's Kindle, Echo Dots and tablets. The report detailed issues of working conditions at the factory between August 2007 and April 2018. The issues identified in the report include excessive working hours (over 100 hours of overtime per month at peak production season) exceeding the legal overtime limit in China. In addition, it was claimed that some workers worked 14 days in a row with no days off. • Sources: [The Verge, 11/06/2018: theverge.com][China Labor Watch, 10/06/2018: chinalaborwatch.org][Reuters, 10/06/2018: reuters.com][Reuters, 10/06/2018: reuters.com]
E(1).1	The Company has responded publicly to the allegation	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Public response available: The Company stated that "Amazon takes reported violations of our Supplier Code of Conduct extremely seriously...which states suppliers must provide workers a safe and healthy work environment, working hours must not exceed the maximum amount permitted by law, and suppliers must pay their workers in a timely manner and provide compensation (including overtime pay and benefits) that, at a minimum, comply with applicable laws." [The Verge article on excessive working hours, 06/2018: theverge.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Response goes into detail: The Company does not disclose the details of the case.
E(1).2	The Company has appropriate policies in place	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Company policies address the general issues raised • Met: Policies apply to the type of business relationships involved: The Company states that "Working Hours. Except in unusual or emergency situations, (i) suppliers must not require a worker to work more than 60 hours per week, including overtime, and (ii) each worker must be entitled to at least one day off for every seven-day work period. In all circumstances, working hours must not exceed the maximum amount permitted by law." [Supplier Code - Website, N/A] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Policies address the specific rights in question
E(1).3	The Company has taken appropriate action	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Engages with affected stakeholders: CHRB did not find the evidence of the Company's engagement with affected stakeholders. • Met: Encourages linked business to engage affected stakeholders: The Company stated "We immediately requested a corrective action plan from Foxconn," It also said it is monitoring Foxconn's response and "compliance with our Supplier Code of Conduct." [Reuters story about Foxconn, 10/06/2018: reuters.com] • Not met: Provides remedies to affected stakeholders: CHRB did not find evidence of the Company providing remedies. • Not met: Has reviewed management systems to prevent recurrence: CHRB did not find evidence of the Company reviewing the system followed by the case. <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Remedies are satisfactory to the victims • Not met: Has improved systems and engaged affected stakeholders: CHRB did not find evidence of the Company's improving the system or engaging with stakeholders followed by the case. • Not met: Denies allegations, but implements review recommendations • Not met: Denies allegations, and ensures systems prevent such impacts
E(2).0	Serious allegation No 2		<ul style="list-style-type: none"> • Headline: Twelve Tribe's Common Sense Farm linked of child labor in Cambridge, US • Area: Child labour • Story: The New York State Department of Labor found multiple violations of state child labour laws and abuse occurring at the Common Sense Farm in Washington County, New York, USA. The farm and production center location of religious sect 'Twelve Tribes' supplies soaps and skincare products to supermarkets including Walmart, Target, Amazon and Whole Foods. • Sources: [Times Union - 06/06/2018: timesunion.com][Inside Edition - 01/06/2018: insideedition.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
E(2).1	The Company has responded publicly to the allegation	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: Public response available: CHRB could not find the evidence of the Company's response in public regarding this case. Score 2 <ul style="list-style-type: none"> Not met: Response goes into detail
E(2).2	The Company has appropriate policies in place	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Met: Company policies address the general issues raised: The Company states in its Global Human Rights Policy: '[...] we respect and support the Core Conventions of the International Labour Organization (ILO), the ILO Declaration on Fundamental Principles and Rights at Work, [...]' [Global Human Rights Principles, N/A: sustainability.aboutamazon.com] Met: Policies apply to the type of business relationships involved: In its Supply Chain Standards, the Company include provisions related to the ILO Core, including: 'Amazon does not tolerate the use of child labor. [Supplier Code - Website, N/A] Score 2 <ul style="list-style-type: none"> Not met: Policies address the specific rights in question: CHRB could not find the Company's measures to verify the age of its workers.
E(2).3	The Company has taken appropriate action	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: Engages with affected stakeholders: CHRB did not find the evidence of the Company's engagement with affected stakeholders. Not met: Encourages linked business to engage affected stakeholders: CHRB could not find the evidence of the Company's encouraging its business partners to engage with the affected stakeholders. Not met: Provides remedies to affected stakeholders: CHRB did not find evidence of the Company providing remedies. Not met: Has reviewed management systems to prevent recurrence Score 2 <ul style="list-style-type: none"> Not met: Has improved systems and engaged affected stakeholders: CHRB did not find evidence of the Company's improving the system or engaging with stakeholders followed by the case.
E(3).0	Serious allegation No 3		<ul style="list-style-type: none"> Headline: Amazon faces allegations of bad working conditions of delivery drivers Area: Working hours Story: On December 24, 2018, various news outlets reported that an undercover probe has revealed the conditions that Amazon delivery drivers are forced to work under. The workers are subcontracted by delivery companies, many of which work almost exclusively for Amazon. Findings revealed that drivers work regularly more than 12 hour shifts earning less than minimum wage and some overtime was not paid. Furthermore, drivers are also charged to rent vans and get money deducted from wages to pay for criminal history checks, drug and alcohol testing. The pressure of the job has allegedly caused traffic accidents which have resulted in death and injuries of third parties. Following the reports, US senators called for information on the Company's delivery network. Sources: [Mirror - 24/12/2018: mirror.co.uk][Forbes - 13/09/2018: forbes.com][Business Insider - 11/09/2018: businessinsider.com][Buzzfeed News - 06/09/2019: buzzfeednews.com]
E(3).1	The Company has responded publicly to the allegation	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Met: Public response available: The Company responded to the senators' inquiry, stating the following regarding working hours: 'we have sophisticated technology that plans routes to be completed within a specified time period taking into account numerous factors and data from prior routes. Drivers are subject to driving time policies similar to federal Hours of Service requirements, and we take steps to reduce the risk of fatigue. For example, we ensure that drivers who are running late are called back to the delivery station, even if they have packages left to deliver, or a support driver is dispatched to help complete the route. [...] We require that our DSPs provide their employees with competitive wages of at least \$15 an hour, well above the federal minimum wage. We require all DSPs to provide health care coverage that meets or exceeds federal standards for affordability and minimum value, as defined by the Affordable Care Act, for all employees who average at least 30 hours per week. Full time drivers must receive no less than 80 hours of paid time off per year.' [Sen. Blumenthal Called Amazon's Response To Delivery Inquiry "Evasive", 3/10/2019: propublica.org] Score 2 <ul style="list-style-type: none"> Not met: Response goes into detail

Indicator Code	Indicator name	Score (out of 2)	Explanation
E(3).2	The Company has appropriate policies in place	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Company policies address the general issues raised • Met: Policies apply to the type of business relationships involved: The Company's Supply Chain Standards includes policy related to working hours. [Supply Chain Standards, 2019: d39w7f4ix9f5s9.cloudfront.net] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Policies address the specific rights in question
E(3).3	The Company has taken appropriate action	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Engages with affected stakeholders • Not met: Provides remedies to affected stakeholders • Not met: Has reviewed management systems to prevent recurrence: The Company has cut ties with several delivery firms for not being up to standard. However, it is unclear if these were the only firms that were related to the allegation about working hours. [Amazon Is Firing Its Delivery Firms Following People's Deaths, 12/10/2019: buzzfeednews.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Remedies are satisfactory to the victims • Not met: Has improved systems and engaged affected stakeholders
E(4).0	Serious allegation No 4		<ul style="list-style-type: none"> • Headline: Amazon supplier, Foxconn, is facing allegation of breaching Chinese labour laws • Area: Child labour, working hours • Story: On August 8, 2019, the Guardian reported that hundreds of schoolchildren have been drafted by Foxconn to make Amazon's Alexa devices in China as part of an attempt to meet production targets, according to documents seen by the Guardian. <p>According to the documents, the teenagers are classified as "interns", and their teachers are paid by the factory to accompany them. Teachers are asked to encourage uncooperative pupils to accept overtime work on top of regular shifts.</p> <p>Interviews with workers and leaked documents from Amazon's supplier, Foxconn, show that many of the children have been required to work nights and overtime to produce the smart-speaker devices, in breach of Chinese labour laws. Chinese factories are allowed to employ students aged 16 and older, but these schoolchildren are not allowed to work nights or overtime.</p> <p>Foxconn admitted that students had been employed illegally and said it was taking immediate action to fix the situation.</p> <ul style="list-style-type: none"> • Sources: [The Guardian - 08/08/2019: theguardian.com][][][]
E(4).1	The Company has responded publicly to the allegation	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Public response available: According to the press, a spokesperson for the Company stated 'We are urgently investigating these allegations and addressing this with Foxconn at the most senior level. Additional teams of specialists arrived on-site yesterday to investigate, and we've initiated weekly audits of this issue.' [Schoolchildren in China work overnight to produce Amazon Alexa devices, 8/8/2019: theguardian.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Response goes into detail
E(4).2	The Company has appropriate policies in place	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Company policies address the general issues raised: The Company indicates it respects the ILO core conventions, which includes child labour. However, no policy related to working hours for own operations could be found. [Global Human Rights Principles, N/A: sustainability.aboutamazon.com] • Met: Policies apply to the type of business relationships involved: The Supply Chain Standards includes policy relating to child labour and young or student workers, as well as establishing working hours. [Supply Chain Standards, 2019: d39w7f4ix9f5s9.cloudfront.net] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Policies address the specific rights in question: No information found about mechanisms to prevent the use of child labour. Additionally, the Company's policy on working hours is not aligned with international standards.
E(4).3	The Company has taken	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Engages with affected stakeholders

Indicator Code	Indicator name	Score (out of 2)	Explanation
	appropriate action		<ul style="list-style-type: none"> • Not met: Provides remedies to affected stakeholders • Not met: Has reviewed management systems to prevent recurrence Score 2 <ul style="list-style-type: none"> • Not met: Remedies are satisfactory to the victims • Not met: Has improved systems and engaged affected stakeholders
E(5).0	Serious allegation No 5		<ul style="list-style-type: none"> • Headline: Ebay, Walmart and Amazon allegedly sell Turkmenistan cotton products • Area: Forced labour • Story: On the 19th February, 2019, Apparel Insider reported that products made with cotton that was picked using forced labour have been found on Amazon, Walmart and ebay. In May 2018, US Customs and Border Protection (CBP) banned the import of any products containing cotton from Turkmenistan due to the country's systematic use of state-sponsored forced labor during the annual cotton harvest. <p>According to Cotton Campaign (part of International Labour Rights Forum), To harvest cotton, the Turkmen government forces tens of thousands of citizens to pick cotton each year. Authorities force public sector workers, including teachers, doctors, nurses, and staff of government offices to pick cotton, pay a bribe, or hire a replacement worker, under threat of losing their job. Despite national laws prohibiting child labor and a 2008 ban of child labor in the cotton sector, children continue to do the hazardous field work, because the government maintains the cotton production system. Children pick cotton for their parents, who are forced by the government to fulfill individual cotton picking quotas under threat of losing their jobs.</p> <p>Researchers from the International Labour Rights Forum found cotton hand towels advertised as "made in Turkmenistan" on the websites of Amazon, Walmart, and eBay which raised legitimate questions about the Companies' social standards in supply chain. The International Labor Rights Forum said none of retailers are directly importing or selling the products, but instead they were allowing third-party sellers access to their e-commerce platforms in exchange for a cut of the sales proceeds.</p> <ul style="list-style-type: none"> • Sources: [Apparel Insider - 19/02/2019: apparelinsider.com][Cotton Campaign - 1/2/2020: cottoncampaign.org]
E(5).1	The Company has responded publicly to the allegation	1	<p>The individual elements of the assessment are met or not as follows:</p> Score 1 <ul style="list-style-type: none"> • Met: Public response available: In a statement on the BHRRC, the company states that 'Third-party sellers are required to comply with all relevant laws, regulations, and policies when listing items for sale in our store. Those who do not will be subject to action, including potential removal of their account. Items produced in whole or in part by forced labor, such as cotton from Turkmenistan and Uzbekistan, are prohibited by Amazon. The items in question are no longer available' [Response to allegation on cotton from Turkmenistan, 18/02/2019: business-humanrights.org] Score 2 <ul style="list-style-type: none"> • Not met: Response goes into detail
E(5).2	The Company has appropriate policies in place	2	<p>The individual elements of the assessment are met or not as follows:</p> Score 1 <ul style="list-style-type: none"> • Met: Company policies address the general issues raised: The Company states in its Global Human Rights Principles that it respects the ILO Core Conventions, which include prohibition of forced labour. [Global Human Rights Principles, N/A: sustainability.aboutamazon.com] • Met: Policies apply to the type of business relationships involved: The Company's 'suppliers must not use forced labor—slave, prison, indentured, bonded, or otherwise. Amazon does not tolerate suppliers that traffic workers or in any other way exploit workers by means of threat, force, coercion, abduction, or fraud.' [Supply Chain Standards, 2019: d39w7f4ix9f5s9.cloudfront.net] Score 2 <ul style="list-style-type: none"> • Met: Policies address the specific rights in question: The Supply Chain Standards mention mechanisms to prevent forced labour. [Supply Chain Standards, 2019: d39w7f4ix9f5s9.cloudfront.net]
E(5).3	The Company has taken appropriate action	0	<p>The individual elements of the assessment are met or not as follows:</p> Score 1 <ul style="list-style-type: none"> • Not met: Engages with affected stakeholders • Not met: Provides remedies to affected stakeholders • Not met: Has reviewed management systems to prevent recurrence

Indicator Code	Indicator name	Score (out of 2)	Explanation
			Score 2 <ul style="list-style-type: none"> • Not met: Remedies are satisfactory to the victims • Not met: Has improved systems and engaged affected stakeholders
E(6).0	Serious allegation No 6		<ul style="list-style-type: none"> • Headline: Amazon accused of dismissing a worker due to her pregnancy in the US and denying a pregnant employee to be excused from strenuous task in the UK • Area: discrimination • Story: Seven women working at Amazon fulfillment warehouses over the past eight years have alleged that they were discriminated against for being pregnant. Following the notification of their superiors of pregnancy, seven women were fired. Six of the seven women settled with Amazon out of court. The women requested "longer bathroom breaks and fewer hours on their feet," and stated that Amazon "failed to accommodate their needs." The company denies the allegation, saying that it has not fired anyone for being pregnant. • Sources: [BBC News - 06/05/2019: bbc.co.uk][CNET - 08/05/2019: cnet.com]
E(6).1	The Company has responded publicly to the allegation	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Public response available: Amazon has responded publicly to the allegation. The Company has denied that it would fire any employee for being pregnant, stating that it is an equal opportunity employer. [Global Human Rights Principles, N/A: sustainability.aboutamazon.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Response goes into detail: The Company stated that it was not able to discuss the specifics of ongoing cases.
E(6).2	The Company has appropriate policies in place	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Company policies address the general issues raised: The Company has an equal opportunity policy and states that does not tolerate discrimination based on pregnancy. The Company states that its approach to human rights is informed by the Core Conventions of the International Labour Organization, ILO Declaration on Fundamental Principles and Rights at Work, and the UN Universal Declaration of Human Rights. [Global Human Rights Principles, N/A: sustainability.aboutamazon.com] • Met: Policies apply to the type of business relationships involved: The Company's Global Human Rights Principles state that it is committed to embedding human rights throughout its business. [Global Human Rights Principles, N/A: sustainability.aboutamazon.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Policies address the specific rights in question [Global Human Rights Principles, N/A: sustainability.aboutamazon.com]
E(6).3	The Company has taken appropriate action	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Denies allegations, but has engaged affected stakeholders: The company denies the allegations, and there is no evidence to suggest that the company has engaged with affected stakeholders. The company has provided settlements to six of the seven women affected. The company's spokesperson stated: "We work with our employees to accommodate their medical needs including pregnancy-related needs. We also support new parents by offering various maternity and parental leave benefits." [Amazon accused of failing pregnant workers, 08/05/2019: bbc.com & Amazon fired these 7 pregnant workers. Then came the lawsuits, 06/05/2019: cnet.com] • Not met: Denies allegations, but reviewed systems to prevent such impacts: The company denies the allegations, but there is no evidence to suggest that the company has reviewed management systems to prevent recurrence. <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Denies allegations, but implements review recommendations: There is no evidence to suggest that the company has implemented review recommendations. • Not met: Denies allegations, and ensures systems prevent such impacts: There is no evidence that the company has ensured systems to prevent future impacts.

Disclaimer

A score of zero for a particular indicator does not mean that bad practices are present. Rather it means that we have been unable to identify the required information in public documentation.

See the 2020 Key Findings report and the 2019 technical annex for more details of the research process.

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