

Company Name Asahi Group
Industry Agricultural Products (Supply Chain only)
UNGP Core Score (*) 10.5 out of 26

Score	Out of	For indicators
Governance and Policy Commitments		
2	2	A.1.1 Commitment to respect human rights
2	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)		
1.5	2	B.2.1 HRDD - Identifying: Processes and triggers for identifying human rights risks and impacts
2	2	B.2.2 HRDD - Assessing: Assessment of risks and impacts identified (salient risks and key industry risks)
0	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
0.5	2	B.2.5 HRDD - Reporting: Accounting for how human rights impacts are addressed
Remedies and Grievance Mechanisms		
1	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
10.5	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	2	<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: General HRs commitment: The Company states that it respects the human rights and diverse values of all its employees. The respect for human rights is fundamental to everything it does. [Code of Conduct, 08/03/2019: asahigroup-holdings.com] • Met: UNGC principles 1 & 2: Asahi Group Holdings states that it 'is a signatory to the United Nations Global Compact, whose ten principles we are committed to upholding expresses support for the UN Global Compact and publishes the ten principles on its website'. [Human Rights Principles, 08/05/2019: asahigroup-holdings.com] • Met: UDHR: The Company states that it is 'committed to respecting human rights that are recognized internationally and set out in the International Bill of Human Rights' and 'the International Bill of Human Rights refers to three internationally-recognized human rights documents: the Universal Declaration of Human Rights and its corresponding two international treaties, namely the International Covenant on Civil and Political Rights, and the International Covenant on Economic, Social and Cultural Rights'. [Human Rights Principles, 08/05/2019: asahigroup-holdings.com] • Met: International Bill of Rights: Asahi Group discloses on its website that 'we are committed to respecting human rights that are recognized internationally and set out in the International Bill of Human Rights' [Human Rights Principles, 08/05/2019: asahigroup-holdings.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: UNGPs: The Company states that 'we are also committed to the United Nations Guiding Principles on Business and Human Rights'. [Human Rights Principles, 08/05/2019: asahigroup-holdings.com]
A.1.2	Commitment to respect the human rights of workers	2	<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 that 'we are committed to respecting human rights that are recognized internationally and set out in the International Bill of Human Rights and the principles concerning fundamental rights in the International Labour Organization's Declaration on Fundamental Principles and Rights at Work.' [Human Rights Principles, 08/05/2019: asahigroup-holdings.com] • Met: Explicitly list All four ILO for AG suppliers: The Company describes its commitment to ILO and states that expects 'our business partners, including our suppliers, to understand and uphold these Principles and to work with us to ensure that our business complies with these Principles'. As indicated below, the 'Human Rights principles include each ILO core area'. With respect freedom of association and collective bargaining, the Company states: 'We will respect the freedom of association and the right to collective bargaining in accordance with the applicable laws and regulations of the countries and regions where we do business. Where the right to freedom of association and collective bargaining is restricted under national/regional laws and regulations in contravention of international human rights standards, we will seek ways to honour these rights by establishing alternative means of dialogue with employees.' [Human Rights Principles, 08/05/2019: asahigroup-holdings.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Explicit commitment to All four ILO Core: The Company states that is committed to ILO and describes that 'ILO Declaration on Fundamental Principles and Rights at Work sets out principles concerning fundamental rights as minimum labor standards to be protected: freedom of association and the right to collective bargaining, elimination of all forms of forced or compulsory labor, the effective abolition of child labor, and the elimination of discrimination in respect of

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>employment and occupation'. [Human Rights Principles, 08/05/2019: asahigroup-holdings.com]</p> <ul style="list-style-type: none"> • Met: Respect H&S of workers: The Company states that ensuring safety and health for employees at the work setting is one of the important responsibilities for a company. It endeavours to maintain and establish a safe and healthy environment. [Initiatives for Employee Safety and Health, 08/03/2019: asahigroup-holdings.com & Code of Conduct, 08/03/2019: asahigroup-holdings.com] • Met: H&S applies to AG suppliers: The Company has established the Asahi Group Supplier Code of Conduct. In the supplier code, it said that suppliers should ensure safe and healthy work environment. [Asahi Group Supplier Code of Conduct, 01/2020: asahigroup-holdings.com]
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 regular meetings with workers' union council. In 2018 the meeting was held in April. At the meetings, opinions are exchanged mainly about the sharing of the Group's management plans and proposals and questions from labour unions. The Company also discloses engagement with employees through surveys, for which it discloses overall scores by gender in 11 topics including respect for individuals, sustainable engagement, growth opportunities, remuneration and welfare, etc. [Evaluation and Treatment, 15/03/2020: asahigroup-holdings.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Commits to engage stakeholders in design: Although the Company states that the support for the human rights of each employee is being enhanced, no evidence found of commitment to engage with affected stakeholders in the development or monitoring of the human rights approach. [Communication with stakeholders, 08/03/2019: asahigroup-holdings.com] • Not met: Regular stakeholder design engagement: On its website, it is stated that the Company 'has received recommendations from experts from the perspective of what kind of human rights risk management will be necessary in the future to mitigate human rights risks, with a focus on addressing human rights in supply chains that carry a particularly high risk in the food industry.' Additionally, in the 2019 Integrated Report, the CEO writes 'we will hold repeated dialogues with our suppliers and other stakeholders while receiving the candid advice of experts so that we are able to incorporate objective perspectives into our approach.' However, no evidence found of engagement with affected stakeholders. [Our Human Rights Due Diligence Process, N/A: asahigroup-holdings.com & 2019 Integrated Report, 07/2020: asahigroup-holdings.com]
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 that 'we will strive to avoid infringing human rights or contributing to human rights infringements by stakeholders, including our suppliers and other business partners. If we identify that we have caused or contributed to such infringement, we will endeavour to remediate such impacts'. However, to 'strive' and to 'endeavour' do not describe a formal commitment. Also the Company describe its grievance mechanism but this indicator looks for a broader approach to remedy any impact caused or contributed to. The Company has provided comments to CHRB regarding this indicator. However, this document or its content has not been found in publicly available sources. [Human Rights Principles, 08/05/2019: asahigroup-holdings.com] <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

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 the ILO Declaration

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not met: Senior responsibility for HR: The Company states that risks are evaluated and controlled by the Risk management committee, which consists of the directors, the general manager of the General affairs and Legal affairs section and other persons who were appointed separately by the Committee. Modern slavery and other risks to human rights will be evaluated and controlled under this framework. Also the Company states that 'The Board of Directors of Asahi Group Holdings, Ltd. is responsible for ensuring adherence to our human rights commitments and has responsibility for overseeing the implementation of these commitments.' Additionally, 'In order to reduce the risk of human rights infringements in the Group's business activities as a whole, we have established the Asahi Group Human Rights Council as part of sustainability task force in our new sustainability promotion framework. Human rights issues discussed by the Council are reported to the responsible director (executive officer in charge of sustainability), discussed at the Corporate Strategy Board, and then reported to the Board of Directors for further discussion.' However, there is no description about a specific senior manager who is responsible for human rights, it is indicated that 'executive officer in charge of sustainability', however, no specific details found on the actual position. [Asahi Group Statement under the UK Modern Slavery Act, 08/05/2018: asahigroup-holdings.com & Human Rights Principles, 08/05/2019: asahigroup-holdings.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Day-to-day responsibility: The Company states that 'in order to address human rights issues, we have established the Group Human Rights Council within the Group CSR Promotion Council. Under this framework, the six divisions of Asahi Group Holdings - Corporate Strategy, Human resources, General Affairs, Legal Affairs, Procurement, and Sustainability - are working together to promote human rights initiatives'. [Upholding Respect for Human Rights, 08/03/2019: asahigroup-holdings.com & Developing Human Resources on a Global Basis, 08/03/2019: asahigroup-holdings.com] • Met: Day-to-day responsibility for AG in supply chain: The Company has established the Procurement clean line system for suppliers as consultation offices related to human rights and compliance. These systems are operated by the General & Legal affairs management department. [Upholding Respect for Human Rights, 08/03/2019: asahigroup-holdings.com]
B.2.1	Identifying: Processes and triggers for identifying human rights risks and impacts	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: Identifying risks in own operations: The Company is 'undertaking efforts to identify human rights risks facing our supply chain and employees.' It provides a description of the preparations it has made since 2018, which include 'Identify human rights issues in the industry', 'Evaluate significance of human rights risks', 'Conduct survey and gap analysis of current situation', 'Formulate action plan for human rights risks', 'Establish Asahi Group Human Rights Principles', and 'Commence human rights due diligence'. The Company discloses a chart on its report showing activities carried out at different stages. [2019 Integrated Report, 07/2020: asahigroup-holdings.com] • Met: Identifying risks in AG suppliers: See above [2019 Integrated Report, 07/2020: asahigroup-holdings.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Ongoing global risk identification: As indicated above, this process has been implemented since 2018. [2019 Integrated Report, 07/2020: asahigroup-holdings.com] • Not met: In consultation with stakeholders: The Company has provided comments to CHRB regarding this indicator. However, evidence was not material. • Met: In consultation with HR experts: The Company 'has received recommendations from experts from the perspective of what kind of human rights risk management will be necessary in the future to mitigate human rights risks, with a focus on addressing human rights in supply chains that carry a particularly high risk in the food industry'. Although the Company does not name the experts, it describes work carried out including conducting surveys, gap analysis and recommendations 'strengthening approaches to suppliers in high-risk categories' and 'identifying and understanding potential risks in achieving 100% sustainable use of resources and taking action against those risks' (major recommendations). [Our Human Rights Due Diligence Process, N/A: asahigroup-holdings.com] • Not met: Triggered by new circumstances • Not met: Explains use of HRIAs or ESIA (inc HR)

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.2	Assessing: Assessment of risks and impacts identified (salient risks and key industry risks)	2	<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: Salient risk assessment (and context): The Company conducted theoretical analysis of modern slavery risk in 17 countries where its manufacturing plants are located, covering 11 of the key raw ingredients it procures. The results of the analysis indicated that modern slavery risk was 'very high' and 'high' at seven of the countries. 11 items were selected based on the level of assumed risk and procurement volume. The level of modern slavery risk differed according to the country or region. Analysis indicated that growing crops held the highest level of modern slavery risk in the value chain. Also, on its website, describing human rights initiatives, it explains that the identification process for human rights issues and risks involved the review of case studies in countries around the world, in order to identify risks present in its industry and affecting each of its stakeholders. It states 'we assessed the level of importance [...] by assigning a score to each item based on factors including the level of severity within the industry, the level of importance, any shortcomings in our current response in comparison to industry or international standards, and Company's potential to play an influential role'. [Asahi Group Statement under the UK Modern Slavery Act, 08/05/2018: asahigroup-holdings.com & Modern Slavery Risk Analysis, 15/03/2019: asahigroup-holdings.com] • Met: Public disclosure of salient risks: 'The Company recognizes that addressing human rights issues linked to business operations constitutes an important element in fulfilling human rights responsibilities and has set eight issues as important human rights issues: Discrimination; Harassment; Forced Labor and Child Labor; Freedom of Association and the Right to Collective Bargaining; Occupational Health and Safety; Working Hours and Wages; Impacts within the Supply Chain; and Impacts on Local Communities'. [Human Rights Principles, N/A: asahigroup-holdings.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Both requirements under score 1 met
B.2.3	Integrating and Acting: Integrating assessment findings internally and taking 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: Action Plans to mitigate risks: The Company details the plan for human rights due diligence. As of 2020, it is working on action plans in the supply chain, however, no evidence of this beyond forward looking statements could be found. For its own operations, the Company indicates that it is preparing 'to commence human rights due diligence' since 2018. Current evidence found seems to focus in monitoring compliance. This indicator looks for risk-based approach plans to mitigate risks and impacts. [2019 Integrated Report, 07/2020: asahigroup-holdings.com] • Not met: Including in AG supply chain • Not met: Example of Actions decided <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: The Company's PDCA plan suggests that it is currently in the phase of taking action in the supply chain. Part of this includes to 'Track and examine the effects of efforts to address human rights risks'. However, these seem to be forward looking statements, and no evidence could be found of a system to track if actions are effective as of date. [2019 Integrated Report, 07/2020: asahigroup-holdings.com] • 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	0.5	<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: Comms plan re identifying risks: See indicator B.2.1. The Company carries out a global risk identification and assessment process that includes both its own operations and business partners, and describes at least some features of the process. • Met: Comms plan re assessing risks: See indicator B.2.2. • 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: In order to be awarded this indicator, the Company has to achieve a full score in B.2.4

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • 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 Score 2 • Not met: Responding to affected stakeholders concerns: The Company has provided comments to CHRB regarding this indicator. However, evidence 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	<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 'currently offers a consultation service regarding human rights. It comprises two whistle-blowing systems, namely a Clean Line System for employees, and a Procurement Clean Line System for suppliers to discuss compliance issues. Opinions concerning human rights are also fielded through the acceptance of inquiries made through the Asahi Group Holdings, Ltd. website'. [Consultation Service on Human Rights, N/A: asahigroup-holdings.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Number grievances filed, addressed or resolved: The Company reported a total of 61 grievances in 2019. The types of clean line reports are divided in the categories Harassment/bad behavior, Mismanagement of employees, Violation of laws, regulations or company rules, Using company resources for personal gain and other. Although the Company reported 'harassment/bad behaviour, it is not clear how many of the total grievances are related to other topics connected to human rights issues. [Corporate governance website, N/A: asahigroup-holdings.com] • Not met: Channel is available in all appropriate languages: Although the Company states that provides a grievance mechanism, it is not clear if its available in all appropriated languages where the Company operates. . [Human Rights Principles, 08/05/2019: asahigroup-holdings.com] • Not met: Expect AG supplier to have equivalent grievance systems: The Company states that 'the Procurement Clean Line System enables our suppliers and parties wishing to become our suppliers to report incidents where employees of the Asahi Group act in a manner contrary to the Asahi Group Basic Procurement Policies, or when they are involved in activities that appear not to comply with the law or social ethics'. However, there is no mechanism for suppliers' employees complaint about the supplier. The company does disclose information on number of complaints [Asahi Group Supplier Code of Conduct, 01/2020: asahigroup-holdings.com & Procurement Clean Line System, N/A: asahigroup-holdings.com] • Not met: Opens own system to AG supplier workers: The Company has established a Procurement clean line system for suppliers as consultation offices related to human rights and compliance. However, it is not a mechanism which enables suppliers' employees to complain about suppliers [Promotion of CSR Procurement, N/A: asahigroup-holdings.com & Upholding Respect for Human Rights, 08/03/2019: asahigroup-holdings.com]
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: The Company states that it has customer survey channel using postcards. However, it is not sufficient as evidence for this indicator. Additionally, 'The Asahi Group is currently exploring the development of relief mechanisms open to all Group employees as well as suppliers and other stakeholders in society.' However, it is unclear if this is already available to communities where the Company operates. The Company has provided comments to CHRB regarding this indicator. However, this document or its content has not been found in publicly available sources. [Appropriate Response and Support to Consumers, 15/03/2019: asahigroup-holdings.com & Consultation Service on Human Rights, N/A: asahigroup-holdings.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
C.7	Remedying adverse impacts and	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: The Company describes on its annual report that will start a human rights due diligence PDCA process and will

Indicator Code	Indicator name	Score (out of 2)	Explanation
	incorporating lessons learned		<p>establish and subsequently enhance grievance mechanisms for receiving reports from affected people such as its Clean line system. In addition, the Company states that its initiative in 2019 is to formulate plans for PDCA processes and in 2020 will Establishment and subsequent enhancement of systems for providing access to relief for victims. Also, Asahi states that 'are committed to continue enhancing our capacity to identify and respond to human rights impacts resulting from our business operations'. However, no description found about actual approach it took to provide or enable a timely remedy for victims. [2019 Integrated Report, 07/2020: asahigroup-holdings.com & Human Rights Principles, 08/05/2019: asahigroup-holdings.com]</p> <ul style="list-style-type: none"> • Not met: Says how it would remedy key sector risks: The Company has provided comments to CHRB regarding this indicator. However, evidence was not material. Score 2 • 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		No allegations meeting the CHRB severity threshold were found.

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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As WBA, we want to emphasise that the results will always be a proxy for good human rights management, and not an absolute measure of performance. This is because there are no fundamental units of measurement for human rights. Human rights assessments are therefore necessarily more subjective than objective. The Benchmark also captures only a snap shot in time. We therefore want to encourage companies, investors, civil society and governments to look at the broad performance bands that companies are ranked within rather than their precise score because, as with all measurements, there is a reasonably wide margin of error possible in interpretation. We

also want to encourage a greater analytical focus on how scores improve over time rather than upon how a company compares to other companies in the same industry today. The spirit of the exercise is to promote continual improvement via an open assessment process and a common understanding of the importance of the UN Guiding Principles on Business and Human Rights.

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