

Company Name BMW
Industry Automobiles
Overall Score (*) 23.0 out of 100

Theme Score	Out of	For Theme
3.4	10	A. Governance and Policies
4.3	25	B. Embedding Respect and Human Rights Due Diligence
1.7	15	C. Remedies and Grievance Mechanisms
3.6	20	D. Performance: Company Human Rights Practices
6.7	20	E. Performance: Responses to Serious Allegations
3.5	10	F. Transparency

(*) While other sectors are being measured against a reduced set of CHRB Core UNGP Indicators this year the Automotive Manufacturing sector is being measured against the full CHRB Methodology as it is the first year that the sector has been analysed.

Please note that any small differences between the Overall Score and the added total of Measurement Theme scores are due to rounding the numbers at different stages of the score calculation process.

Please note also 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

A. Governance and Policies (10% of Total)

A.1 Policy Commitments (5% of Total)

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: Score 1</p> <ul style="list-style-type: none"> • Met: General HRs commitment: The Company states in its Code on human rights and working conditions that it 'is committed to respecting internationally recognized human rights'. [Code on human rights and working conditions, 04/2019: bmwgroup.com] • Met: UNGC principles 1 & 2: The Company is a member of the UNGC. It states: 'The Group Management and the national and international employee representatives acknowledge their social responsibility and their commitment to the basic principles of the Global Compact. The BMW Group supports this United Nations initiative and undertakes to do what it can to realise the decision of a sustainable, homogenous world economy'. [Joint Declaration on Human Rights and Working Conditions, 2010: bmwgroup.com] • Not met: UDHR • Not met: International Bill of Rights

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> • Not met: UNGPs: The Company indicates in its Code: 'The BMW Group's activities consider the following international standards: the ILO Declaration on Fundamental Principles and Rights at Work, the OECD Guidelines for Multinational Enterprises, the UN Guiding Principles on Business and Human Rights,...'. However, 'to consider' is not consider a formal commitment following CHRB wording criteria. [Code on human rights and working conditions, 04/2019: bmwgroup.com] • Not met: OECD: As indicates above, the Company indicates in its Code: 'The BMW Group's activities consider the following international standards: the ILO Declaration on Fundamental Principles and Rights at Work, the OECD Guidelines for Multinational Enterprises, the UN Guiding Principles on Business and Human Rights,...'. However, 'to consider' is not consider a formal commitment following CHRB wording criteria. [Code on human rights and working conditions, 04/2019: bmwgroup.com]
A.1.2	Commitment to respect the human rights of 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: ILO Core: The Company's Joint Declaration on Human Rights includes provision for each of the ILO Core: 'Forced and compulsory labour (including bonded labour or non-voluntary prisoners labour) as defined in ILO Conventions no. 29 and 105 is rejected. [...] No discrimination [...] No child labor [...] The right of all employees o form collective employee representations and run collective negotiations to settle working conditions is recognised'. [Joint Declaration on Human Rights and Working Conditions, 2010: bmwgroup.com] • Met: Explicitly list ALL four ILO for MO suppliers: The Company's Supplier Sustainability Policy indicates: 'all suppliers are called upon to observe the principles and rights set forth in the guidelines of the UN Initiative 'Global Compact' and the 'ILO Declaration on Fundamental Principles and Rights at Work and its Follow-up' and [...] Of particular importance are the respect for human dignity and internationally recognized human rights like: the prohibition of child labor; the prohibition of modern slavery (i.e. slavery, servitude and forced or compulsory labor and human trafficking); the prohibition of harassment and discrimination; ensuring the right to freedom of association and collective bargaining and; compliance with all applicable labor regulations e.g. regarding working hours, wages and benefits and work safety'. [Group Supplier Sustainability Policy, 06/2020: bmwgroup.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Explicit commitment to All four ILO Core: As indicated above, the Company's Joint Declaration on Human Rights includes provisions for each of the ILO Core: 'Forced and compulsory labour (including bonded labour or non-voluntary prisoners labour) as defined in ILO Conventions no. 29 and 105 is rejected. [...] No discrimination [...] No child labor [...] The right of all employees o form collective employee representations and run collective negotiations to settle working conditions is recognised'. [Joint Declaration on Human Rights and Working Conditions, 2010: bmwgroup.com] • Met: Respect H&S of workers: In addition, also in its Code, the Code states: 'Around the world the BMW Group complies with all the applicable employment protection legislation and sets its own additional standards for improving occupational safety. Effective management systems and certification (e.g. OHSAS 18001) allow regular controls in order to verify adherence to specifications concerning occupational health and safety as well as ergonomic workplace design, which in turn reduces the risk of accidents'. [Code on human rights and working conditions, 04/2019: bmwgroup.com] • Met: H&S applies to MO suppliers: The Company indicates in its Code: 'The General Terms and Conditions of Business and the International Purchasing Conditions of BMW Group stipulate that suppliers must commit to respecting human rights and in particular that they must abide by the ILO Declaration on Fundamental Principles and Rights at Work. [...] As well as forbidding child labor, forced labor and discrimination and ensuring freedom of association, suppliers must adhere to occupational health and safety standards and provide adequate working conditions.' [Code on human rights and working conditions, 04/2019: bmwgroup.com] • Not met: Working hours for workers: With respect working hours, the Company indicates: 'The BMW Group complies with national legal working time regulations as a minimum requirement. In addition, our working time principles describe the BMW Group values for employees resting times, leisure, holiday and a healthy life balance. They support BMW Group entities worldwide in designing working time schedules. Working times and break times take into account not only business but also personal needs. They are based on scientific criteria, such as medically

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>recognized limits regarding physical and psychological stress.' However, no evidence found to ILO conventions on working hours, or clarifying that the maximum working hours for regular working week is 48 hours. [Code on human rights and working conditions, 04/2019: bmwgroup.com]</p> <ul style="list-style-type: none"> • Not met: Working hours for MO suppliers
A.1.3.MO.a	Commitment to responsible sourcing of minerals	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: Responsible mineral sourcing in conflict areas: The Company states in its Supplier Sustainability Policy: 'Based on the risk analysis of the 'We aim to use only raw materials in our products, whose extraction, production, transport, trade, processing and export neither directly nor indirectly contribute to human rights abuses, health & safety issues, environmental pollution or compliance breaches'. In addition, on its website, it states: 'The BMW Group therefore voluntarily undertakes to only use raw materials of which the extraction, transport and trade neither directly or indirectly contribute towards the financing of conflicts and violations of human rights. Our goal is to create full transparency in the supply chains that handle conflict minerals by 2022'. [Group Supplier Sustainability Policy, 06/2020: bmwgroup.com] • Met: Based on OECD Guidance: The Company indicates: 'With regard to raw materials, such as tin, tungsten, tantalum and gold (3TG) from conflict-affected and high-risk areas (CAHRAs) like the Democratic Republic of the Congo (DRC), as well as other raw materials, such as cobalt, lithium, copper etc., we established processes in accordance with the 'OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas' and expect our suppliers to do the same. Smelters and refiners without adequate, audited due diligence processes in place should be avoided'. [Group Supplier Sustainability Policy, 06/2020: bmwgroup.com] • Met: Requires suppliers to follow the OECD Guidance: The Company states that it 'establishes processes in accordance with the "OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas" and expects its suppliers to do the same. Smelters and refiners without adequate, audited due diligence processes in place should be avoided'. [Group Supplier Sustainability Policy, 06/2020: bmwgroup.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Responsible conflict mineral sourcing covers all minerals: As indicated above, the Company 'undertakes to only use raw materials of which the extraction, transport and trade neither directly or indirectly contribute towards the financing of conflicts and violations of human rights.' However, it is not clear whether all minerals are covered by this provision. [Supply chain management, N/A: bmwgroup.com] • Not met: Suppliers expected to make similar requirements of their suppliers
A.1.3.MO.b	Commitment to respect human rights particularly relevant to the industry (ICT)	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: Women's Rights • Not met: Children's Rights • Not met: Migrant worker's rights • Not met: Expecting suppliers to respect these rights <p>Score 2</p> <ul style="list-style-type: none"> • Not met: CEDAW/Women's Empowerment Principles • Not met: Child Rights Convention/Business principles • Not met: Convention on migrant workers • Not met: Respecting the right to water • Not met: Expecting suppliers to respect these rights
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: Commits to stakeholder engagement: In its Stakeholder Engagement Policy, the Company states: 'Business partners, suppliers, community interest groups, media, political and academic leaders, industry associations, NGOs, investors, and other stakeholder groups have different viewpoints and expectations related to our business. Responding to their needs can positively influence our license to operate, our competitive advantage, and our long-term success. In order to seek and address stakeholder perspectives; build trust and develop partnerships; and make use of stakeholder capital, it is essential to have a strategic and global approach toward working with stakeholders. For this reason, we have developed the "Stakeholder Engagement Policy of the BMW Group." This policy addresses the BMW Group's corporate stakeholder engagement strategy and ensures this strategy is applied consistently across our worldwide operations, including all local operations, National Sales Corporations, and government affairs offices. In

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>addition, it advises our local operations on stakeholder identification, prioritization, and communication, as well as on engagement methods and risk management.' [Stakeholder Engagement Policy, 03/2020: bmwgroup.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Commits to engage stakeholders in design • Not met: Regular stakeholder design engagement: In its Sustainable Value Report, the Company indicates: 'With every type of stakeholder dialogue we engage in, feedback from our stakeholders is always factored into the company's strategic considerations. [...] Some of the major topics on which we solicited our stakeholders' views were: Key aspects of corporate responsibility (responsibility for products and production, responsibility for resources, responsibility for the supply chain, responsibility for the mobility of the future, responsibility for employees, social responsibility). [...] Human rights in the supply chain are becoming an increasingly relevant topic in our stakeholder outreach. As a result, the BMW Group frequently heard about specific issues from this area in 2019. The discourse around sustainable raw material procurement is highly important to the BMW Group, and we make regular efforts to engage in a productive dialogue on the subject. For instance, in March 2019, experts from the BMW Group met with stakeholders in Berlin / DE, to discuss critical raw material supply chains.' However, it is not clear whether directly affected stakeholders are engaged in human rights approach design or implementation. [Sustainability Factbook 2019, 2020: bmwgroup.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 <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 MO suppliers to remedy impacts
A.1.6	Commitment to respect the rights of human rights defenders	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: Zero tolerance attacks on HRs Defenders (HRDs) <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Expects MO suppliers to reflect company HRD commitments

A.2 Policy Commitments (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.2.1	Commitment from the top	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: CEO or Board approves policy: The Joint Declaration on Human Rights and Working Conditions is signed by the Chairman of the Board of the Management of BMW AG, a Member of the Board and Human Resources, Industrial Relations Director, the Chairman of the EURO Work Council of the BMW Group and the President of the International Metalworkers' Federation. In addition, The Code on human rights and working conditions was also signed by the Board of Management and General Works Council of BMW AG. [Joint Declaration on Human Rights and Working Conditions, 2010: bmwgroup.com & Code on human rights and working conditions, 04/2019: bmwgroup.com] • Met: Board level oversight for HRs: The Company indicates in its Sustainable Value Report: 'The Board of Management governs the BMW Group under its own responsibility, acting in the interests of the company and with the aim of achieving sustainable growth in value. It determines the strategic orientation of the enterprise and ensures its implementation. The Board of Management is also responsible for ensuring compliance with all provisions of the law and internal regulations as well as for adequate risk management and controlling. The Supervisory Board advises and supervises the Board of Management in conducting its duties (dual management system).' Human Rights are part of its Sustainability Program. [Sustainable Value Report 2019, 2020: bmwgroup.com & Annual Report 2019, 03/2020: annualreport.bmwgroup.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Speeches/letters by Board members or CEO
A.2.2	Board discussions	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: Board/Committee review of salient HRs: The Company indicates in its Sustainable Value Report: 'The Board of Management works to ensure that the Group's Strategy is aligned with sustainability in the long term. The special-purpose Sustainability Board was fully involved in regular Board of Management

Indicator Code	Indicator name	Score (out of 2)	Explanation
			meetings in 2019, allowing sustainability issues to be even more consistently integrated into the company's decision-making processes. Since then, sustainability issues have been treated like every other topic and discussed as needed at fortnightly Board of Management meetings. All specific decisions referred to the Board of Management are subject to a mandatory sustainability evaluation. [Sustainable Value Report 2019, 2020: bmwgroup.com] <ul style="list-style-type: none"> • Not met: Examples or trends re HR discussion Score 2 <ul style="list-style-type: none"> • Not met: Both examples and process
A.2.3	Incentives and performance management	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Incentives for at least one board member: With respect compensation, the Company states: 'The compensation system for the Board of Management at BMW AG is designed to encourage a management approach focused on the sustainable development of the BMW Group. [...] Performance-related bonus: [...] Primarily qualitative, non-financial criteria, expressed in terms of a performance factor aimed at measuring the Board member's contribution to the sustainable and long-term development and the future viability of the Company over a period of at least three financial years.' However, no evidence found indicating that human rights factor are included in the incentive mechanism for CEO/ supervisory board members. [Annual Report 2019, 03/2020: annualreport.bmwgroup.com] • Not met: At least one key MO HR risk, beyond employee H&S Score 2 <ul style="list-style-type: none"> • Not met: Performance criteria made public

B. Embedding Respect and Human Rights Due Diligence (25% of Total)

B.1 Embedding Respect for Human Rights in Company Culture and Management Systems (10% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.1	Responsibility and resources for day-to-day human rights functions	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Commits to ILO core conventions: See indicator A.1.2 • Not met: Senior responsibility for HR: The Company indicates in its Sustainable Value Report: 'The Sustainability and Mobility department is under the direct organisational supervision of the Chairman of the Board of Management within the Corporate Strategy division'. However it is not clear the specific senior management person/body that holds responsibility for human rights issues. [Sustainability Factbook 2019, 2020: bmwgroup.com & Annual Report 2019, 03/2020: annualreport.bmwgroup.com] Score 2 <ul style="list-style-type: none"> • Met: Day-to-day responsibility: Regarding the Sustainability and mobility department, the Company indicates that 'his unit is responsible for global sustainability management. Its tasks include: Identifying challenges and opportunities for sustainable operations; Developing and monitoring sustainability goals; Further developing, specifying and integrating sustainability into the individual divisions, taking the entire value chain into account; Ensuring the cooperation of all departments in the company involved in sustainability'. [Annual Report 2019, 03/2020: annualreport.bmwgroup.com] • Not met: Day-to-day responsibility for MO in supply chain: In its Code, the Company indicates: 'Where potential shortcomings are identified, a Supply Chain Response Team is set up to follow up the issue. Wherever necessary, an escalation process is devised and launched and corrective action plans are developed together with the supplier.' However, no further information found about the responsibilities of the Supply Chain Response Team or another in charge of human rights management in supply chain [Code on human rights and working conditions, 04/2019: bmwgroup.com]
B.1.2	Incentives and performance management	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Senior manager incentives for human rights • Not met: At least one key MO HR risk, beyond employee H&S Score 2 <ul style="list-style-type: none"> • Not met: Performance criteria made public
B.1.3	Integration with enterprise risk management	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: HR risks is integrated as part of enterprise risk system: The Company summarizes its risks and opportunities in its Annual Report, including: 'Risks and opportunities relating to purchasing. [...] Production problems at the level of

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>suppliers could lead to consequences from increased expenditure for the BMW Group to production interruptions and a corresponding reduction in sales volume. [...] Potential reasons for the failure of individual suppliers include in particular IT-related risks, non-compliance with sustainability or quality standards, [...] As part of supplier preselection, the BMW Group checks for compliance with the sustainability standards for the supplier network. This includes consideration of and compliance with internationally recognised human rights and applicable labour and social standards.' [Annual Report 2019, 03/2020: annualreport.bmwgroup.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Audit Ctte or independent risk assessment
B.1.4.a	Communication /dissemination of policy commitment(s) within Company's own operations	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"> • Met: Commits to ILO core conventions: See indicator A.1.2 • Not met: Communicates its policy to all workers in own operations: The Company indicates in its Code on Human Rights: 'Every manager has the duty to inform his or her employees of the content and importance of this Code and to advise and support them in implementing its principles in their day-to-day business.' In addition, the Company states in its Sustainable Value Report that it organises 'specific training on the subject of human rights. Staff at all human resources departments worldwide have received training on the BMW Group Code on Human Rights. Additional training on human rights topics was also held at our units in various Asian countries, for example. These internal training courses are primarily geared towards managers and focus groups such as purchasing staff.' However, it is not clear whether the Company has communicated human rights commitments to all employees worldwide. [Code on human rights and working conditions, 04/2019: bmwgroup.com & Sustainable Value Report 2019, 2020: bmwgroup.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Commits to all 4 ILO core conventions: See indicator A.1.2 • Not met: Communication of policy commitments to stakeholder: The Company reports that 'In the year under review, the Code was presented at international human rights conferences and through targeted communications campaigns in different markets.' However, no evidence found describing how the Company communicates its policy commitments to stakeholders including local communities and potentially affected stakeholders. [Sustainable Value Report 2019, 2020: bmwgroup.com] • Not met: How policy commitments are made accessible to audience
B.1.4.b	Communication /dissemination of policy commitment(s) to business relationships	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: Commits to all 4 ILO core conventions for suppliers • Not met: Communicating policy down the whole MO supply chain • Met: Requiring MO suppliers to communicate policy down the chain: In its Code on Human Rights, the Company states: 'The General Terms and Conditions of Business and the International Purchasing Conditions of BMW Group stipulate that suppliers must commit to respecting human rights and in particular that they must abide by the ILO Declaration on Fundamental Principles and Rights at Work. They are required to cause their sub-contractors to act accordingly by undertaking reasonable and meaningful steps to ensure that these responsibilities are realized, e.g. by communicating a supplier sustainability policy for their suppliers.' [Code on human rights and working conditions, 04/2019: bmwgroup.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: How HR commitments made binding/contractual: As indicated above, the Company states: 'The General Terms and Conditions of Business and the International Purchasing Conditions of BMW Group stipulate that suppliers must commit to respecting human rights and in particular that they must abide by the ILO Declaration on Fundamental Principles and Rights at Work'. [Code on human rights and working conditions, 04/2019: bmwgroup.com] • Not met: Including on MO suppliers
B.1.5	Training on 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"> • Met: Scores at least 1 on A.1.2 • Not met: Trains all workers on HR policy commitments: The Company indicates in its Sustainable Value Report: 'We organise specific training on the subject of human rights. Staff at all human resources departments worldwide have received training on the BMW Group Code on Human Rights. Additional training on human rights topics was also held at our units in various Asian countries, for example. These internal training courses are primarily geared towards managers and focus groups such as purchasing staff'. However, it is not clear that all employees received human rights training. [Sustainable Value Report 2019, 2020: bmwgroup.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Met: Trains relevant MO managers including procurement: As indicated above, the Company states that 'Staff at all human resources departments worldwide have received training on the BMW Group Code on Human Rights.' and that 'These internal training courses are primarily geared towards managers and focus groups such as purchasing staff.' [Sustainable Value Report 2019, 2020: bmwgroup.com] Score 2 <ul style="list-style-type: none"> • Not met: Score of 2 on A.1.2 • Not met: Both requirements under score 1 met
B.1.6	Monitoring and corrective actions	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Scores at least 1 on A.1.2 • Met: Monitoring implementation of HR policy commitments: In the section about Compliance and Human Rights in its Annual Report, the Company indicates: 'Activities to avoid non-compliance with the law are managed and monitored by the BMW Group Compliance Committee. These activities include legal monitoring, internal compliance regulations, communications and training activities, complaint and case management, compliance reporting and compliance controls, as well as following through with sanctions in cases of non-compliance'. The BMW Group Compliance Committee Office has more than 20 employees and is allocated in organisational terms to the Chairman of the Board of Management. For operational implementation of compliance topics, it is supported by a Group-wide compliance network of around 240 BMW Group Compliance Responsible (heads of the local units) and over 70 local Compliance Officers (heads of the local compliance functions). [Annual Report 2019, 03/2020: annualreport.bmwgroup.com] • Met: Monitoring MO suppliers: In its Code, the Company indicates: 'Respecting human rights is an evaluation criterion in the supplier selection process and a component of a three-stage risk management process. This includes a risk filter, a media screening, a sustainability self-assessment questionnaire for the automotive industry, a BMW Group specific modular questionnaire, internal on-site assessments and external audits. These measures support the BMW Group in identifying supplier facilities and product groups at particularly high risk of being linked to human rights abuses.' [Code on human rights and working conditions, 04/2019: bmwgroup.com] Score 2 <ul style="list-style-type: none"> • Not met: Score of 2 on A.1.2 • Not met: Describes corrective action process: In addition, it indicates: 'Where potential shortcomings are identified, a Supply Chain Response Team is set up to follow up the issue. Wherever necessary, an escalation process is devised and launched and corrective action plans are developed together with the supplier. Where a supplier fails to take effective action, the BMW Group may potentially terminate the supply contract.' In addition, in its Sustainable Value Report, the Company indicates: '[...] 94 audits and eleven assessments were carried out by or on behalf of the BMW Group in the reporting period. Crucial areas of action identified by audits and assessments have been highlighted, particularly in the areas of hazardous substance management, waste management and working conditions or occupational safety.' However, no evidence found in relation to the number of incidents related to human rights found. [Code on human rights and working conditions, 04/2019: bmwgroup.com & Sustainable Value Report 2019, 2020: bmwgroup.com] • Not met: Example of corrective action • Not met: Discloses % of MO supply chain monitored: As indicated above, the Company carried out 94 audits and eleven assessments. However, it is not clear the percentage of its supply chain that this figure represents. [Sustainable Value Report 2019, 2020: bmwgroup.com]
B.1.7	Engaging business relationships	1.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: HR affects MO selection of suppliers: The Company states in its Code: 'Respecting human rights is an evaluation criterion in the supplier selection process and a component of a three-stage risk management process.' In addition, in its Sustainable Value Report, it states: 'A total of 153 supplier locations were not commissioned because they do not meet the sustainability requirements of the BMW Group, among other things'. [Code on human rights and working conditions, 04/2019: bmwgroup.com & Sustainable Value Report 2019, 2020: bmwgroup.com] • Met: HR affects on-going MO supplier relationships: In addition, also in its Code, the Company states: 'Where potential shortcomings are identified, a Supply Chain Response Team is set up to follow up the issue. Wherever necessary, an escalation process is devised and launched and corrective action plans are developed together with the supplier. Where a supplier fails to take effective action, the BMW Group

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>may potentially terminate the supply contract'. [Code on human rights and working conditions, 04/2019: bmwgroup.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Met: Both requirement under score 1 met • Not met: Working with MO suppliers to improve performance: In addition, the Company reports: 'In order to ensure an active transformation towards a sustainable supplier network, we seek close collaboration with our suppliers and are committed to their further development in all aspects of sustainability. To this end, we deliver training, information events and various other activities as part of our development programme.' However, no further details found describing how the Company is working with its suppliers to improve specifically their human rights performance. [Sustainable Value Report 2019, 2020: bmwgroup.com]
B.1.8	Approach to engagement with potentially affected stakeholders	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: Stakeholder process or systems: In its Stakeholder Engagement Policy, the Company states: '[...] we have developed the "Stakeholder Engagement Policy of the BMW Group." This policy addresses the BMW Group's corporate stakeholder engagement strategy and ensures this strategy is applied consistently across our worldwide operations, including all local operations, National Sales Corporations, and government affairs offices. In addition, it advises our local operations on stakeholder identification, prioritization, and communication, as well as on engagement methods and risk management.' However, no description found on how specifically identified affected stakeholders and engaged with them in the last two years, including human rights. [Stakeholder Engagement Policy, 03/2020: bmwgroup.com] • Not met: Frequency and triggers for engagement: The Company discloses some information about its Stakeholder groups and forms of dialogue in its Sustainable Value Report. For instance, it reports that it engages with its suppliers through 'Dialogue in the context of industry initiatives, joint events, training courses, presentations, supplier risk assessments'. However, no further information found, including frequency and triggers for engagement with affected (and potentially affected) stakeholders. [Sustainable Value Report 2019, 2020: bmwgroup.com] • Not met: Workers in MO SC engaged • Not met: Communities in the MO SC engaged <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Analysis of stakeholder views and company's actions on them

B.2 Human Rights Due Diligence (15% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
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"> • Met: Identifying risks in own operations: The Company describes its Due Diligence Process in its Sustainable Value Report with a Diagram, where a cycle of 6 steps is shown: '[...] 2. Identify and evaluate negative effects in business activities, supply chains and business relations: BMW-specific risk filter, Media screening, Cross-OEM sustainability questionnaire, Third-party (external) sustainability audits, Second-party (internal) sustainability assessments, Supply chain assessments'. [Sustainable Value Report 2019, 2020: bmwgroup.com] • Not met: Identifying risks in MO suppliers: The Company indicates in its 'Supply Chain Diligence' document: 'In the course of our sustainability due diligence process we identify suppliers who do not fulfil the BMW sustainability requirements. With these suppliers BMW agrees on corrective actions which the supplier has to implement in order to comply with the BMW sustainability requirements. In this way, BMW ensures that our sustainability requirements are met at each supplier location. This is achieved through self-qualification by the supplier. Since November 2014, one central tool for the identification of problematic suppliers within our supply chain due diligence process is a self-assessment questionnaire (SAQ).' However, the evidence seems to describe an individual monitoring process per supplier (assessed in B.1.6) and not a general due diligence process to identify which are the different issues that the Company faces across its supply chain (risk approach rather than supplier approach). [Supply chain due diligence - Communication on progress, 05/2019: bmwgroup.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Ongoing global risk identification • Not met: In consultation with stakeholders • Not met: In consultation with HR experts • Not met: Triggered by new circumstances

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)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Salient risk assessment (and context) • Not met: Public disclosure of salient risks Score 2 <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	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Action Plans to mitigate risks • Not met: Including in MO supply chain • Not met: Example of Actions decided Score 2 <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	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: System to check if Actions are effective: In its MSA, the Company indicates: 'Since 2014, the BMW Group has been using this system to implement the following core elements of human rights due diligence: Identify actual and potential adverse impacts on human rights, Measures to prevent potential negative impacts, and the verify the effectiveness of these measures.' However, no further information found, including a description of the system in place to check the effectiveness of its Action Plan for all its salient human rights identified and assessed. No new relevant evidence found in latest reports. [MSA 2018, 05/2019: bmwgroup.com] Score 2 <ul style="list-style-type: none"> • Not met: Lessons learnt from checking effectiveness • Not met: Both requirement under score 1 met
B.2.5	Communicating : Accounting for how human rights impacts are addressed	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Comms plan re identifying risks • Not met: Comms plan re assessing risks • Not met: Comms plan re action plans for risks • Not met: Comms plan re reviewing action plans • Not met: Including MO suppliers Score 2 <ul style="list-style-type: none"> • Not met: Responding to affected stakeholders concerns • Not met: Ensuring affected stakeholders can access communications

C. Remedies and Grievance Mechanisms (15% of Total)

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	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Channel accessible to all workers: In its Code, the Company indicates: 'The BMW Group has two points of contact for dealing with questions and concerns relating to human rights. The BMW Group Compliance Contact helpline is available to answer questions and queries about the BMW Group Human Rights Code and advises on assessing possible breaches and on what to do next. [...] Additionally the BMW Group offers its employees the opportunity to report potential human rights concerns anonymously and confidentially via the BMW Group SpeakUP Line. This service is available in all countries where BMW Group employees operate. [Code on human rights and working conditions, 04/2019: bmwgroup.com] Score 2 <ul style="list-style-type: none"> • Not met: Number grievances filed, addressed or resolved • Met: Channel is available in all appropriate languages: With respect its SpeakUp Line, the Company indicates: 'This service is available in all countries where BMW Group employees operate. It can be reached around the clock via a local toll-free number and operates in 34 languages.' [Code on human rights and working conditions, 04/2019: bmwgroup.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Met: Opens own system to MO supplier workers: The Company indicates in its Business Relations Compliance: 'You may also contact the BMW Group SpeakUP Line on an anonymous and confidential basis with information regarding possible violations of the law in connection with BMW Group business relations. Further information can be obtained from your BMW Group contact person or the BMW Group Compliance Contact.' Furthermore, on its website section 'Supply Chain Management', the Company indicates: 'Human Rights Contact Supply Chain: a grievance mechanism available via phone +49 (0)89 / 382-71230 and email (humanrights.sscm@bmwgroup.com) to directly report sustainability violations in the supply chain of BMW Group'. [Relations Compliance, 11/2019: bmwgroup.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 <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Describes accessibility and local languages • Not met: Expects MO supplier to have community grievance systems • Not met: MO supplier communities use global system
C.3	Users are involved in the design and performance of the channel(s)/mechanism(s)	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 users to create or assess system • Not met: Example of how they do this <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Engages with users on system performance • Not met: Provides user engagement example on performance • Not met: MO suppliers consult users in creation or assessment
C.4	Procedures related to the mechanism(s)/channel(s) are publicly available and explained	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: Response timescales • Not met: How complainants will be informed • Not met: Who is handling the complaint <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Escalation to senior/independent level
C.5	Commitment to non-retaliation over complaints or concerns made	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: Public statement prohibiting retaliation • Met: Practical measures to prevent retaliation: The Company indicates that 'BMW Group offers its employees the opportunity to report potential human rights concerns anonymously and confidentially via the BMW Group SpeakUP Line. This service is available in all countries where BMW Group employees operate. It can be reached around the clock via a local toll-free number and operates in 34 languages. Alternatively, employees can report their concerns online'. [Code on human rights and working conditions, 04/2019: bmwgroup.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Has not retaliated in practice • Not met: Expects MO suppliers to prohibit retaliation
C.6	Company involvement with State-based judicial and non-judicial grievance mechanisms	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: Won't impede state based mechanisms • Not met: Complainants not asked to waive rights <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Will work with state based or non judicial mechanisms • Not met: Example of issue resolved (if applicable)
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

D. Performance: Company Human Rights Practices (20% of Total)

D.5 Automotive Manufacturing

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.5.1.a	Living wage (in own production or manufacturing operations)	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: Living wage target timeframe: The Company states in its Code: 'Employees are remunerated fairly by both internal and external standards. Uniform principles provide the foundation for a well-balanced global rewards system. Where legislation exists, the BMW Group pays its employees at least the legal minimum wage applicable in the economic area concerned. It also strives to provide its employees with above-average remuneration overall (consisting of salaries and fringe benefits) compared with the rest of the local employment market.' However, no reference found to living wage. [Code on human rights and working conditions, 04/2019: bmwgroup.com] Not met: Describes how living wage determined <p>Score 2</p> <ul style="list-style-type: none"> Not met: Achieved payment of living wage Not met: Regularly review definition of living wage with unions
D.5.1.b	Living wage (in the supply chain)	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: Living wage in supplier code or contracts: The Company's General Terms and Conditions for Purchasing indicates in the Section 'Social Responsibilities': 'The following principles are of particular importance: [...] Remuneration, which permits employees to secure their livelihoods including their social and cultural participation'. However, no reference found to living wage. [Terms and Conditions for the Purchase of Production Materials and Automotive Components, 31/03/2018: b2b.bmw.com] Not met: Improving living wage practices of suppliers <p>Score 2</p> <ul style="list-style-type: none"> Not met: Both requirements under score 1 met Not met: Provide analysis of trends demonstrating progress
D.5.2	Aligning purchasing decisions with human rights	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: Avoids business model pressure on HRs Not met: Positive incentives to respect human rights <p>Score 2</p> <ul style="list-style-type: none"> Not met: Both requirements under score 1 met
D.5.3	Mapping and disclosing the supply chain	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: Identifies suppliers back to product source: The Company indicates on its website: 'Furthermore, we are conducting in-depth supply chain assessments to safeguard specific supply chains. These assessments are conducted around products, which have been defined as sustainability light house projects and have been prioritized in terms of risk. The goal of these supply chain assessments is to establish transparency from the BMW Group up to the suppliers of raw materials (supply chain mapping).' However, it seems it is a work in progress. [Supply chain due diligence - Communication on progress, 05/2019: bmwgroup.com] <p>Score 2</p> <ul style="list-style-type: none"> Not met: Discloses significant parts of supply chain and why
D.5.4.a	Prohibition on child labour: Age verification and corrective actions (in own production or manufacturing operations)	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: Does not use child labour: The Company states in its Code: 'The BMW Group does not tolerate child labor of any kind. A child's development must not be hampered by undertaking any kind of work that keeps them from receiving an education. Their dignity must be respected and their health and safety protected. In accordance with ILO Core Conventions, the BMW Group adheres to minimum employment ages and fully rejects child labor, in particular all worst forms of child labor, i.e. dangerous work that can harm the health, safety or morals of children.' [Code on human rights and working conditions, 04/2019: bmwgroup.com] Not met: Age verification of job applicants and workers <p>Score 2</p> <ul style="list-style-type: none"> Not met: Remediation if children identified

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.5.4.b	Prohibition on child labour: Age verification and corrective actions (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: Child Labour rules in codes or contracts: The Company's General Terms and Conditions for Purchasing indicates in the Section 'Social Responsibilities': 'The following principles are of particular importance: [...] Elimination of forced, compulsory, and child labor,[...]'. However, no reference found to child labour requirements including age verification of job applicants and worker remediation programmes. [Terms and Conditions for the Purchase of Production Materials and Automotive Components, 31/03/2018: b2b.bmw.com] Not met: How working with suppliers on child labour Score 2 <ul style="list-style-type: none"> Not met: Both requirements under score 1 met Not met: Provide analysis of trends demonstrating progress
D.5.5.a	Prohibition on forced labour: Debt bondage and other unacceptable financial costs (in own production or manufacturing operations)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: Pays workers in full and on time Not met: Payslips show any legitimate deductions Score 2 <ul style="list-style-type: none"> Not met: How these practices are implemented and monitored for agencies, labour brokers or recruiters
D.5.5.b	Prohibition on forced labour: Debt bondage and other unacceptable financial costs (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: Debt and fees rules in codes or contracts: The Company's General Terms and Conditions for Purchasing indicates in the Section 'Social Responsibilities': 'The following principles are of particular importance: [...] Elimination of forced, compulsory, and child labor,[...]'. However, no references found to debt bondage requirements, such as: refraining from imposing any financial burdens on workers by withholding wages or expenses including recruitment fees and related recruitment costs. [Terms and Conditions for the Purchase of Production Materials and Automotive Components, 31/03/2018: b2b.bmw.com] Not met: How working with suppliers on debt & fees Score 2 <ul style="list-style-type: none"> Not met: Both requirements under score 1 met Not met: Provide analysis of trends in progress made
D.5.5.c	Prohibition on forced labour: Restrictions on workers (in own production or manufacturing operations)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: Does not retain documents or restrict movement: The Company states in its Code: 'The BMW Group does not tolerate forced or compulsory labor of any kind. In accordance with ILO Core Labor Standards, the BMW Group opposes the use of forced or unlawful compulsory labor of any kind in its business activities.' However, no specific provision related to freedom of movement found (no retain personal documents, not restrict workers' freedom of movements outside work hours or require workers to stay at and pay for accommodation by the Company). [Code on human rights and working conditions, 04/2019: bmwgroup.com] Score 2 <ul style="list-style-type: none"> Not met: How sure about agencies or brokers
D.5.5.d	Prohibition on forced labour: Restrictions on workers (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: Free movement rules in codes or contracts: The Company's General Terms and Conditions for Purchasing indicates in the Section 'Social Responsibilities': 'The following principles are of particular importance: [...] Elimination of forced, compulsory, and child labor,[...]'. However, no reference found to requirements on workers' freedom of movements, such as: refraining from restricting workers' movements through retention of passports or other personal identification or travel documents or bank payment cards or similar arrangements for accessing wages or other measures to physically restrict movement. [Terms and Conditions for the Purchase of Production Materials and Automotive Components, 31/03/2018: b2b.bmw.com] Not met: How these practices are implemented and monitored for agencies, labour brokers or recruiters Score 2 <ul style="list-style-type: none"> Not met: Both requirements under score 1 met Not met: Provide analysis of trends in progress made

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.5.6.a	Freedom of association and collective bargaining (in own production or manufacturing operations)	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: Commits not to interfere with union rights and collective bargaining and prohibits intimidation and retaliation: The Company indicates in its Code: 'The BMW Group recognizes the rights of its employees to form representative bodies and participate in collective bargaining regarding working conditions. [...] Even on controversial issues, it aims to maintain stable collaborations with representative bodies for its own interests as well as for the good of its employees. Employees are neither shown preference nor disadvantaged for either belonging or choosing not to belong to a trade union or employee representative body. Where a facility has no applicable employee representatives, the BMW Group promotes a regular dialogue between the workforce and the company'. Despite not having found an the total percentage of workers covered by collective bargaining agreements, as indicated below is over 80% in all countries but the USA and South Africa (which represents approximately 12% of the total workforce). High percentage of coverage is considered a proxy for not retaliating in practice. [Code on human rights and working conditions, 04/2019: bmwgroup.com & Sustainable Value Report 2019, 2020: bmwgroup.com] • Met: Discloses % covered by collective bargaining: The Company discloses the percentage of employees covered by a collective bargaining agreement per country: Germany (100%), UK (85%), China (plant) (100%), Austria (100%), South Africa (59%), USA (0%), Mexico (100%). Despite not providing a global percentage of coverage, the Company discloses the number of employees per country. [Sustainable Value Report 2019, 2020: bmwgroup.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Both requirement under score 1 met
D.5.6.b	Freedom of association and collective bargaining (in the supply chain)	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: FoA & CB rules in codes or contracts: The Company's General Terms and Conditions for Purchasing indicates in the Section 'Social Responsibilities': 'The following principles are of particular importance: [...] Positive and negative freedom of association, [...]'. However, no reference found to collective bargaining and prohibiting intimidation, harassment, retaliation and violence against trade union members and trade union representatives. [Terms and Conditions for the Purchase of Production Materials and Automotive Components, 31/03/2018: b2b.bmw.com] • Not met: How working with suppliers on FoA and CB <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met • Not met: Provide analysis of trends in progress made
D.5.7.a	Health and safety: Fatalities, lost days, injury rates (in own production of manufacturing operations)	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: Injury Rate disclosures: The Company discloses information about its 'Accident frequency rate' in its Sustainable Value Report for the last 5 years (3.5 in 2019). [Sustainable Value Report 2019, 2020: bmwgroup.com] • Met: Lost days or near miss disclosure: The Company also reports: 'The number of days of absence due to severe accidents (number of days of absence due to an occupational accident per one million working hours), which has been consolidated at BMW Group level since 2017, increased slightly compared to the previous year (2018: 71.3, 2019: 78.3).' [Sustainable Value Report 2019, 2020: bmwgroup.com] • Met: Fatalities disclosures: 'There were no fatal accidents in 2019.' [Sustainable Value Report 2019, 2020: bmwgroup.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Set targets for H&S performance: In addition, the Company indicates: 'The target we set ourselves in 2011 of halving the accident frequency rate by 2020 was already achieved in 2015. And we will continue to work on further reducing it in the future'. However, no additional targets found related to the other indicators required, or aiming at achieving 'zero harm'. [Sustainable Value Report 2019, 2020: bmwgroup.com] • Met: Met targets or explains why not: As indicated above, the Company indicates: 'The target we set ourselves in 2011 of halving the accident frequency rate by 2020 was already achieved in 2015. And we will continue to work on further reducing it in the future.' [Sustainable Value Report 2019, 2020: bmwgroup.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.5.7.b	Health and safety: Fatalities, lost days, injury rates (in the supply chain)	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Sets out clear Health and Safety requirements: The Company's General Terms and Conditions for the purchase indicates: 'Seller shall at the latest by start of production (SOP), implement, operate and prove to Buyer by presentation of a corresponding certificate, a certified occupational health and safety management system in accordance with "OHSAS 18001" or "ISO 45001" or a recognized and certified occupational health and safety management system derived therefrom.' [Sustainable Value Report 2019, 2020: bmwgroup.com] <ul style="list-style-type: none"> • Not met: Injury rate disclosures • Not met: Lost days or near miss disclosures • Not met: Fatalities disclosures Score 2 <ul style="list-style-type: none"> • Not met: How working with suppliers on H&S • Not met: Provide analysis of trends in progress made
D.5.8.a	Women's rights (in own production or manufacturing operations)	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Process to stop harassment and violence: In its Legal Compliance Code, the Company states: 'All forms of workplace harassment, including sexual harassment, are strictly prohibited. Everyone has the right to be protected from harassment, no matter if the alleged harasser believes that his or her behavior is acceptable or whether the alleged victim would be capable of avoiding the harassment.' However, no details found on how the Company implements this provision applied to violence against women. [Legal Compliance Code, 11/2019: bmwgroup.com] • Not met: Working conditions take account of gender • Met: Equality of opportunity at all levels: The Company indicates in its Sustainable Value Report: 'Promoting women has been a particular focus at the BMW Group for many years now. In order to continue to move towards a gender balance in the company, we are implementing a large number of measures in the areas of talent identification and HR development. [...] The share of female managers at BMW AG rose by 0.7 percentage points to 15.8 % in the year under review. The share of female managers at the BMW Group increased to 17.5 %, thus exceeding the self-imposed target range of 15–17 %. The share of female employees at BMW AG is 16.3 % of the total workforce and 19.8 % at the BMW Group. In the young talent groups, the proportion of women in the year under review was around 39 % for the trainee programme and about 28 % for the academic youth talent programmes (2018: 44 and 28 % respectively). With a share of 35 % of women on the Supervisory Board, we are in compliance with the recommendation of the German Corporate Governance Code.' [Sustainable Value Report 2019, 2020: bmwgroup.com] Score 2 <ul style="list-style-type: none"> • Not met: Meets all of the requirements under score 1
D.5.8.b	Women's rights (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Women's rights in codes or contracts • Not met: How working with suppliers on women's rights Score 2 <ul style="list-style-type: none"> • Not met: Both requirement under score 1 met • Not met: Provide analysis of trends in progress made
D.5.9.a	Working hours (in own production or manufacturing operations)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Respects max hours, min breaks and rest periods in its own operations: The Company's Code indicates: 'The BMW Group complies with national legal working time regulations as a minimum requirement. In addition, our working time principles describe the BMW Group values for employees resting times, leisure, holiday and a healthy life balance. They support BMW Group entities worldwide in designing working time schedules. Working times and break times take into account not only business but also personal needs.' However, there is no reference to international standards or clarifying that maximum working hours for a regular working week must not exceed 48 hours. [Code on human rights and working conditions, 04/2019: bmwgroup.com] Score 2 <ul style="list-style-type: none"> • Not met: How it implements and checks this
D.5.9.b	Working hours (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Working hours in codes or contracts • Not met: How working with suppliers on working hours

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met • Not met: Provide analysis of trends in progress made
D.5.10.a	Responsible Mineral Sourcing: Arrangements with Suppliers and Smelters/Refiners in the Mineral Resource Supply Chains	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: Due diligence in accordance with OECD Guidance in supplier contracts: In its Supplier Sustainability Policy, the Company indicates: 'With regard to raw materials, such as tin, tungsten, tantalum and gold (3TG) from conflict-affected and high-risk areas (CAHRAs) like the Democratic Republic of the Congo (DRC), as well as other raw materials, such as cobalt, lithium, copper etc., we established processes in accordance with the 'OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas' and expect our suppliers to do the same. Smelters and refiners without adequate, audited due diligence processes in place shall be avoided'. However, no reference found to this policy in the General Terms and Conditions for the Purchasing, or other binding agreements. [Group Supplier Sustainability Policy, 06/2020: bmwgroup.com & Terms and Conditions for the Purchase of Production Materials and Automotive Components, 31/03/2018: b2b.bmw.com] • Not met: Works with smelters/refiners and suppliers to build capacity <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Contractual requirement to disclosure smelter/refiner information: In addition, the Company indicates: 'Upon request, suppliers shall disclose their supply chain including information on the origin of the material, e.g. via the 'Responsible Minerals Assurance Process' (RMAP) by the RMI.' However, it is not clear that this requirement is included in a contractual agreement. [Group Supplier Sustainability Policy, 06/2020: bmwgroup.com] • Not met: Contractual requirement covers all minerals
D.5.10.b	Responsible Mineral Sourcing: Risk Identification in Mineral Supply Chain	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: Risk identification and disclosure in line with OECD Guidance: The Company states in its 'Complying with due diligence in supplier selection' document: 'In relation to conflict minerals, the BMW Group has introduced a process for complying with due diligence based on OECD Due Diligence Guidance. For each request for a quotation we use our sustainability questionnaire, which contains a separate section for conflict minerals. All affected suppliers must upload a valid Conflict Mineral Reporting Template (CMRT). In cases of non-compliance with our due diligence requirements an escalation process will be carried out. [...] All 3TG suppliers then receive detailed feedback concerning the status of their smelters and refineries, including suggestions for improving 3TG management. In addition, we aim to achieve full transparency (response rate) in terms of affected suppliers through our financial and personal involvement in the Responsible Mineral Initiative (RMI). We thus support the cross-industry Conflict Free Smelter (CFS) programme, in order to significantly increase the number of conflict-free smelters and refineries over the next few years'. No further information found, including risks identified. [Complying with due diligence in supplier selection, 06/2019: bmwgroup.com] • Met: Identification of smelter/refiners and OECD Guidance: As indicated above, 'all affected suppliers must upload a valid Conflict Mineral Reporting Template (CMRT). In cases of non-compliance [...]. All 3TG suppliers then receive a detailed feedback concerning the status of their smelters and refineries'. [Complying with due diligence in supplier selection, 06/2019: bmwgroup.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Discloses smelters/refiners judged in line with OECD Guidance • Not met: Risk identification and disclosure covers all minerals
D.5.10.c	Responsible Mineral Sourcing: Risk Management in the Mineral Supply Chain	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 mineral risk management plan for supply chain • Not met: Monitoring, tracking and whether better risk prevention/mitigation over time <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Disclose better risk prevention/mitigation over time • Not met: Suppliers and stakeholders engaged in risk management strategy • Not met: Risk management and response processes cover all minerals

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.5.11	Responsible Materials Sourcing	[SD.5.10]	<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: Due diligence for raw materials in supplier code/contracts: The Company indicates that 'We aim to use only raw materials in our products, whose extraction, production, transport, trade, processing and export neither directly nor indirectly contribute to human rights abuses, health & safety issues, environmental pollution or compliance breaches. With regard to raw materials, such as tin, tungsten, tantalum and gold (3TG) from conflict-affected and high-risk areas (CAHRAs) like the Democratic Republic of the Congo (DRC), as well as other raw materials, such as cobalt, lithium, copper etc., we established processes in accordance with the 'OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas' and expect our suppliers to do the same. [...] Raw materials should be obtained from audited sources as a matter of principle wherever possible, using independent, third-party assurance, such as the Standard for Responsible Mining from the 'Initiative for Responsible Mining Assurance' (IRMA). The BMW Group participates in multi-stakeholder initiatives which aim to establish the standards set out in this document in raw material supply chains and expects its suppliers also to be active in this kind of activities whenever relevant and necessary.' In addition, it states: 'we have been supporting the Aluminium Stewardship Initiative (ASI) since December 2012. [...] The goal of ASI is to establish a standard for responsibly produced aluminium across the entire value chain: from responsible company management to compliance with environmental standards to social standards. [...] Renewable raw materials grow in forests, plantations and on fields, where BMW's sustainability standards must also be guaranteed. [...] Taking sustainability certificates into account when selecting materials guarantees compliance with basic principles with respect to social, environmental and compliance issues and is recognised worldwide. We will continue and intensify these efforts to develop a sustainable and transparent supply chain for natural materials by engaging in dialogue and cooperation with our suppliers [...]'. However, no evidence found of due diligence for raw material provision in the Company's General Terms and Conditions for the Purchase, or the expectation/requirement of due diligence for raw materials being a contractual requisite. [Group Supplier Sustainability Policy, 06/2020: bmwgroup.com & Terms and Conditions for the Purchase of Production Materials and Automotive Components, 31/03/2018: b2b.bmw.com] • Met: Works with suppliers to build capacity in risk assessment and due diligence: The Company describes different initiatives and strategies it is implementing with respect raw materials and supply chain in its Sustainable Value Report: 'Steel and Aluminium. [...] we had an audit carried out as an industrial user at our light metal foundry in Landshut according to the performance standard and we are working very closely with our partners in the supplier network on gaining certification for the remaining links in the supply chain, all the way upstream to the mine. [...] Cobalt. [...] In the Congo, we are involved in the "Cobalt for Development" pilot project, [...] we are promoting responsible artisanal cobalt mining. [...]Copper. [...] we have initiated several pilot projects to make the copper supply chain for the vehicles' electrical system more transparent. Together with our suppliers DRÄXLMAIER Group and LEONI AG we have mapped all steps in the supply chain and visited cable production, copper processing and mining locations. We are using the results from these activities to develop solutions in collaboration with stakeholders from politics, society and industry. [Sustainable Value Report 2019, 2020: bmwgroup.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Meets all requirements under score 1 • Not met: Identify the sources of high-risk raw materials in its supply chain

E. Performance: Responses to Serious Allegations (20% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
E(1).0	Serious allegation No 1		<ul style="list-style-type: none"> • Headline: BMW faces child labour claims in its supply chain in the Democratic Republic of Congo • Area: Child labour, forced labour, health & safety, environmental damage • Story: On November 15, 2017, Amnesty International, a Human Rights NGO, released a report which reveals that electronic and electric vehicle companies, including BMW, are still not doing enough to stop human rights abuses entering their cobalt supply chains. <p>The report assessed the policies and practices of 29 companies and how much their cobalt-sourcing practices have improved since its previous report published in January 2016. More than half of the world's cobalt, a key element in lithium-ion batteries, is from the Democratic Republic of Congo (DRC), where Amnesty has found human rights abuses. Amnesty International stated that about a fifth of the country's cobalt production is mined by informal miners including children, often in dangerous conditions.</p> <p>The electronics companies and the automobile manufacturers included in the report are: Apple, Samsung SDI, Dell, HP, BMW, Tesla, LG Chem, Sony, Samsung Electronics, General Motors, Volkswagen, Fiat-Chrysler, Daimler, Hunan, Shanshan, Amperex Technology, Tianjin Lishen, Microsoft, Lenovo, Renault, Vodafone, Huawei, L&F, Tianjin B&M, BYD, Coslight, Shenzhen BAK and ZTE.</p> <ul style="list-style-type: none"> • Sources: [Amnesty International — 15/11/2017: amnesty.org][Reuters — 15/11/2017: reuters.com][Amnesty International - 15/11/2017: amnesty.org][
E(1).1	The Company has responded publicly to the allegation	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: Public response available: The Company responded to Amnesty International, however, the response does not include recognition of the allegation of the use of child labour in its supply chain. Instead, the response explains Company policies to address risks related to mineral mining. [Company Responses to Amnesty International, 15/11/2017: amnesty.org] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Response goes into detail
E(1).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 Joint Declaration on Human Rights includes policies on forced labour and child labour. [Joint Declaration on Human Rights and Working Conditions, 2010: bmwgroup.com] • Met: Policies apply to the type of business relationships involved: The Supplier Sustainability Policy includes forced labour and child labour. [Supplier Sustainability Policy, 12/2018] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Policies address the specific rights in question: The Terms and Conditions for the Purchase of Production Materials and Automotive Components does not include specific provisions to prevent forced labour and child labour. [Terms and Conditions for the Purchase of Production Materials and Automotive Components, 31/03/2018: b2b.bmw.com]
E(1).3	The Company has taken appropriate action	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: Engages with affected stakeholders: In its response to Amnesty, it stated that 'BMW Group supported an independent academic research project conducted by the Center for Effective Global Action (CEGA) at the University of Berkeley together with several other companies. The research of the UC Berkeley aims to provide rigorous empirical data on households engaged in artisanal mining, and it involves collecting survey data from households, children, village leaders, and local mineral traders in 150 communities that are representative and cover the full geographical extent of the DRC Copper Belt'. As it is difficult to engage otherwise with the affected stakeholders, CHRB accepts this as engagement [Company Responses to Amnesty International, 15/11/2017: amnesty.org] • Not met: Provides remedies to affected stakeholders • Met: Has reviewed management systems to prevent recurrence: According to the Dow Jones Institutional News, a BMW spokeswoman said that 'Companies working with the raw material cobalt are confronted with the challenge that violations of environmental standards and human rights cannot be completely ruled out when mining the raw material.' Subsequently, BMW opted to sign supply contracts with mines outside the Democratic Republic of Congo in order to rule out any residual risk of human rights violations, added the same source. Through

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>these agreements, BMW expects to secure supply at least until 2025 for the car maker's fifth generation of battery cells from 2020 onward.</p> <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Remedies are satisfactory to the victims • Met: Has improved systems and engaged affected stakeholders: See above. [Company Responses to Amnesty International, 15/11/2017: amnesty.org]
E(2).0	Serious allegation No 2		<ul style="list-style-type: none"> • Headline: BMW, Renault, and other companies criticized for potential ties to farms linked to slave labor in Paraguay • Area: forced labour • Story: In November 2016 on a farm called Estância Ruroka run by Mennonite cooperatives, Paraguayan government inspectors found 35 people working and living in inhumane conditions. The workers were given inadequate living arrangements, did not have enough drinking water and were indebted to recruiters due to paying for food. An investigation found potential links between this farm and large automobile firms, BMW, Citroën, Peugeot, Renault and Nissan. The investigation reports that Cencoprod, a company in the Chaco region that is run by three Mennonite cooperatives, has supplied leather either directly or indirectly to all five companies. • Sources: [The Guardian - 18/09/2018: theguardian.com]
E(2).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 publicly responded to the allegation, stating that it confirmed one of its leather suppliers purchased materials from Cencoprod, the company in the Chaco region run by three Mennonite cooperatives. However, BMW denies the allegation, stating that the Estância Ruroka farm (where evidence of slave labor was found) was not a supplier of Cencoprod and was therefore not directly involved in its supply chain. [BMW, Renault, and other companies criticized for potential ties to farms linked to slave labour, 18/09/18: theguardian.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Response goes into detail: The company has not provided a detailed response to the allegations.
E(2).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 states that it does not tolerate forced or compulsory labor of any kind. The company states, "In accordance with ILO Core Labor Standards, the BMW Group opposes the use of forced or unlawful compulsory labor of any kind in its business activities." [Code on human rights and working conditions, 04/2019: bmwgroup.com] • Met: Policies apply to the type of business relationships involved: The company's human rights policy applies to employees, suppliers and the company's authorized sales organization. [Code on human rights and working conditions, 04/2019: bmwgroup.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Policies address the specific rights in question: CHRB did not find a specific provision related to freedom of movement (no retain personal documents, not restrict workers' freedom of movements outside work hours or require workers to stay at and pay for accommodation by the Company). [Code on human rights and working conditions, 04/2019: bmwgroup.com]
E(2).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: There is no evidence to suggest that the company has engaged with affected stakeholders. • Not met: Encourages linked business to engage affected stakeholders: There is no evidence to suggest that the company has encouraged its suppliers to engage with affected stakeholders. The company states that in cases like this, it "conducts an investigation with our direct supplier to check the facts," and that it "definitively does not tolerate any kind of violation of human rights in its production chains." [BMW, Renault, and other companies criticized for potential ties to farms linked to slave labour, 18/09/18: theguardian.com] • Not met: Provides remedies to affected stakeholders: There is no evidence to suggest that the company has provided remedies to affected stakeholders. • Not met: Has reviewed management systems to prevent recurrence: There is no evidence to suggest that the company has reviewed management systems to prevent recurrence.

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> • Not met: Remedies are satisfactory to the victims: There is no evidence to suggest that the company has provided remedies that are satisfactory to the victims. • Not met: Has improved systems and engaged affected stakeholders: There is no evidence to suggest that the company has improved systems and engaged affected stakeholders.
E(3).0	Serious allegation No 3		<ul style="list-style-type: none"> • Headline: BMW and GM linked to child labor issues in illegal mica mining in India • Area: child labour; forced labour • Story: In 2018, Terres de Hommes, a Dutch child rights NGO published a report on child labour in the Mica industry. Mica is a mineral that creates the shimmery car paint used on millions of vehicles around the world. It is estimated that up to 20,000 children work in hundreds of small-scale mines in northern Jharkhand and southern Bihar. On visits this year to illegal mines in the Tisri subdistrict in the Indian state of Jharkhand, the Guardian documented children aged 12 mining mica underground in hazardous, leaking mineshafts, hammering glittering rock flakes from walls and carrying heavy loads through slippery tunnels. In addition, many families are bonded to the mines by large debts owed to local moneylenders or mine owners who charge up to 200% annual interest. • Sources: [The Guardian - 28/07/2016: theguardian.com][BHRRRC -: business-humanrights.org][Reuters - 19/12/2017: news.trust.org][Terres de Hommes - 12/03/2018: terredeshommes.nl]
E(3).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 has responded to the allegations. It states that it was investigating the claim and that initial findings “suggest that two of our suppliers may indeed obtain materials indirectly from Fujian Kuncai Fine Chemicals Co Ltd. In accordance with our guidelines, we have asked these two suppliers to respond to these allegations.” The company affirmed that it does not tolerate child labor in its supply chain, and that “if the allegations are substantiated, we will do everything to ensure that the company involved is no longer part of our supply chain in the future.” [Vauxhall and BMW among car firms linked to child labour over glittery mica paint, 28/07/2016: theguardian.com & BMW, Audi, Volkswagen, & Vauxhall Utilizing Mica Suppliers Linked To Illegal Child Labour, 29/07/2016: cleantechnica.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Response goes into detail: There is no evidence that the company’s response goes into detail.
E(3).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 states that it does not tolerate forced, compulsory or child labor of any kind. The company states, “In accordance with ILO Core Labor Standards, the BMW Group opposes the use of forced or unlawful compulsory labor of any kind in its business activities.” It also states that in accordance with ILO Core Labor Standards, the company “adheres to minimum employment ages and fully rejects child labor, in particular all worst forms of child labor...” [Joint Declaration on Human Rights and Working Conditions, 2010: bmwgroup.com & Code on human rights and working conditions, 04/2019: bmwgroup.com] • Met: Policies apply to the type of business relationships involved: The company’s human rights policy applies to employees, suppliers and the company’s authorized sales organization. [Code on human rights and working conditions, 04/2019: bmwgroup.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Policies address the specific rights in question: The Terms and Conditions for the Purchase of Production Materials and Automotive Components does not include specific provisions to prevent forced labour and child labour. [Terms and Conditions for the Purchase of Production Materials and Automotive Components, 31/03/2018: b2b.bmw.com]
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: There is no evidence to suggest that the company has engaged with affected stakeholders. • Not met: Encourages linked business to engage affected stakeholders: There is no evidence to suggest that the company has encouraged its suppliers to engage with affected stakeholders. • Not met: Provides remedies to affected stakeholders: There is no evidence to suggest that the company has provided remedies to affected stakeholders.

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not met: Has reviewed management systems to prevent recurrence: There is no evidence to suggest that the company has reviewed management systems to prevent recurrence. Score 2 <ul style="list-style-type: none"> • Not met: Remedies are satisfactory to the victims: There is no evidence to suggest that the company has provided remedies that are satisfactory to the victims. • Not met: Has improved systems and engaged affected stakeholders: There is no evidence to suggest that the company has improved systems and engaged affected stakeholders.

F. Transparency (10% of Total)

Indicator Code	Indicator name	Score	Explanation
F.1	Company willingness to publish information	1.47 out of 4	Out of a total of 60 indicators assessed under sections A-D of the benchmark, BMW made data public that met one or more elements of the methodology in 22 cases, leading to a disclosure score of 1.47 out of 4 points.
F.2	Recognised Reporting Initiatives	2 out of 2	The individual elements of the assessment are met or not as follows: Score 2 <ul style="list-style-type: none"> • Met: Company reports on GRI: 'The Sustainable Value Report is published together with the Annual Report and drawn up in accordance with the "Comprehensive" option of the standards of the Global Reporting Initiative (GRI). It also discloses a GRI index. [Annual Report 2019, 03/2020: annualreport.bmwgroup.com & GRI Index 2019, 2020: bmwgroup.com]
F.3	Key, High Quality Disclosures	0 out of 4	BMW met 0 of the 10 thresholds listed below and therefore gets 0 out of 4 points for the high quality disclosure indicator. Specificity and use of concrete examples <ul style="list-style-type: none"> • Not met: Score 2 for A.2.2 : Board discussions • Not met: Score 2 for B.1.6 : Monitoring and corrective actions • Not met: Score 2 for C.1 : Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers • Not met: Score 2 for C.3 : Users are involved in the design and performance of the channel(s)/mechanism(s) Discussing challenges openly <ul style="list-style-type: none"> • Not met: Score 2 for B.2.4 : Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts • Not met: Score 2 for C.7 : Remedying adverse impacts and incorporating lessons learned Demonstrating a forward focus <ul style="list-style-type: none"> • Not met: Score 2 for A.2.3 : Incentives and performance management • Not met: Score 2 for B.1.2 : Incentives and performance management • Not met: Score 1 for D.5.1.a: Living wage (in own production or manufacturing operations) • Not met: Score 2 for D.5.7.a: Health and safety: Fatalities, lost days, injury rates (in own production of manufacturing operations)

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.

The Benchmark is made available on the express understanding that it will be used solely for general information purposes. The material contained in the Benchmark should not be construed as relating to accounting, legal, regulatory, tax, research or investment advice and it is not intended to take into account any specific or general investment objectives. The material contained in the Benchmark does not constitute a recommendation to take any action or to buy or sell or otherwise deal with anything or anyone identified or contemplated in the Benchmark. Before acting on anything contained in this material, you should consider whether it is suitable to your particular circumstances and, if necessary, seek professional advice.

The CHRB is part of the World Benchmarking Alliance ('WBA'). The material in the Benchmark has been put together solely according to the CHRB methodology and not any other assessment models in operation within any of the project partners or EIRIS Foundation as provider of the analyst team.

No representation or warranty is given that the material in the Benchmark is accurate, complete or up-to-date. The material in the Benchmark is based on information that we consider correct and any statements, opinions, conclusions or recommendations contained therein are honestly and reasonably held or made at the time of publication. Any opinions expressed are our current opinions as of the date of the publication of the Benchmark

only and may change without notice. Any views expressed in the Benchmark only represent the views of WBA, unless otherwise expressly noted.

While the material contained in the Benchmark has been prepared in good faith, neither WBA nor any of its agents, representatives, advisers, affiliates, directors, officers or employees accept any responsibility for or make any representation or warranty (either express or implied) as to the truth, accuracy, reliability or completeness of the information contained in this Benchmark or any other information made available in connection with the Benchmark. Neither WBA nor any of its agents, representatives, advisers, affiliates, directors, officers and employees undertake any obligation to provide the users of the Benchmark with additional information or to update the information contained therein or to correct any inaccuracies which may become apparent (save as to the extent set out in CHRB appeals procedure). To the maximum extent permitted by law any responsibility or liability for the Benchmark or any related material is expressly disclaimed provided that nothing in this disclaimer shall exclude any liability for, or any remedy in respect of, fraud or fraudulent misrepresentation. Any disputes, claims or proceedings this in connection with or arising in relation to this Benchmark will be governed by and construed in accordance with Dutch law and shall be subject to the exclusive jurisdiction of the Courts of Amsterdam.

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.

COPYRIGHT

Our publications and benchmarks are the product of the World Benchmarking Alliance. Our work is licensed under the Creative Commons Attribution-Non Commercial-No Derivatives 4.0 International License. To view a copy of this license, visit creativecommons.org