

Company Name BOE Technology Group
Industry ICT (Own operations and Supply Chain)
UNGP Core Score (*) 3.0 out of 26

Score	Out of	For indicators
Governance and Policy Commitments		
0	2	A.1.1 Commitment to respect human rights
0	2	A.1.2 Commitment to respect the human rights of workers
1	2	A.1.4 Commitment to engage with stakeholders
0	2	A.1.5 Commitment to remedy
Embedding respect and Human Rights Due Diligence		
Embedding respect		
0.5	2	B.1.1 Embedding - Responsibility and resources for day-to-day human rights functions
Human Rights Due Diligence (HRDD)		
0	2	B.2.1 HRDD - Identifying: Processes and triggers for identifying human rights risks and impacts
0	2	B.2.2 HRDD - Assessing: Assessment of risks and impacts identified (salient risks and key industry risks)
0	2	B.2.3 HRDD - Integrating and Acting: Integrating assessment findings internally and taking appropriate action
0	2	B.2.4 HRDD - Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts
0	2	B.2.5 HRDD - Reporting: Accounting for how human rights impacts are addressed
Remedies and Grievance Mechanisms		
1.5	2	C.1 Grievance channels/mechanisms to receive complaints or concerns from workers
0	2	C.2 Grievance channels/mechanisms to receive complaints or concerns from external individuals and communities
0	2	C.7 Remedying adverse impacts and incorporating lessons learned
3.0	26	

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

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

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

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

Detailed assessment

Governance and Policies

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1.1	Commitment to respect human rights	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: General HRs commitment • Not met: UNGC principles 1 & 2 • Not met: UDHR • Not met: International Bill of Rights <p>Score 2</p> <ul style="list-style-type: none"> • Not met: UNGPs • Not met: OECD
A.1.2	Commitment to respect the human rights of workers	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: ILO Core • Not met: UNGC principles 3-6 • Not met: Explicitly list ALL four ILO for ICT suppliers <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Explicit commitment to All four ILO Core: The Company states that it 'strictly prohibits the use of child labor, eliminates forced labor, and does not allow the use of violence, threats or illegal restriction of personal freedom to force employees to work or restrict their freedom (work or resignation). Corporal punishment, intimidation, harassment, abuse and any discrimination against employees are strictly prohibited'. Moreover, 'All entities under BOE have set up Labor Unions, the participation rate of employees is 100%, and the coverage rate of collective bargaining agreement is 100%'. However, no reference a commitment to respecting freedom of association found. [2019 Sustainability Report, 2020: waterdrop.cc] • Not met: Respect H&S of workers: In its 2018 CSR report, the Company states that, in order to ensure the scientific, reasonable and systematic operation of the Company's safety management, 18 subsidiaries under BOE have passed OHSAS 18001 Occupational Health and Safety Management System Certification and have carried out self-discovery and self-correction according to the systematic requirements annually. The Company has several health and safety programmes under its 'Safeguarding Employees' Rights and Interests. Moreover, in its 2019 Sustainability Report, it indicates that 'Healthy and safe working environment is the foundation of normal production and operation of enterprises. BOE has a sound safety management system, and has set up a safety management committee'. However, although the Company has a certified Health and Safety Management System and a safety committee, no publicly available statement of policy committing it to respecting the health and safety of workers found. [2019 Sustainability Report, 2020: waterdrop.cc & Sustainability Report 2018, 2019: waterdrop.cc] • Not met: H&S applies to ICT suppliers • Not met: working hours for workers • Not met: Working hours for ICT suppliers: Although working hours is one of the aspects of CSR Management Regulations for Suppliers, it is not clear the Company's policy commitment expects its suppliers to commit to respecting the health and safety of their workers. [2019 Sustainability Report, 2020: waterdrop.cc]
A.1.4	Commitment to engage with stakeholders	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Regular stakeholder engagement: For the past two years, the Company had regular engagements with stakeholders. Main methods for communication and the contents are disclosed respectively for each stakeholder group. For example, when addressing affected communities, the Company uses information disclosure, field trips, questionnaire surveys, public interest projects and community volunteer activities to engage in topics like pollution prevention and control, resource

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			recycling, support for education and environmental protection, volunteer services and community integration. [2019 Sustainability Report, 2020: waterdrop.cc] Score 2 <ul style="list-style-type: none"> • Not met: Commits to engage stakeholders in design • Not met: Regular stakeholder design engagement: The Company indicates that 'In 2019, BOE had broad and in-depth communication with stakeholders such as customers, investors, suppliers, employees, governments, and communities through diverse interactions, sought to learn about their expectations and demands, and accepted their constructive suggestions, improving operation and management of the Company together with them'. However, it is not clear that the company regularly engages with affected stakeholders and their legitimate representatives in the development or monitoring of its human rights approach. [2019 Sustainability Report, 2020: waterdrop.cc]
A.1.5	Commitment to remedy	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Commits to remedy Score 2 <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 ICT suppliers to remedy impacts

Embedding Respect and Human Rights Due Diligence

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.1	Responsibility and resources for day-to-day human rights functions	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Commits to ILO core conventions • Met: Senior responsibility for HR: The Company indicates that 'In order to effectively implement the concept of responsibility into each position, the company has set up an independent CSR management committee, which is responsible for studying and establishing CSR strategies, visions, principles and policies, handling CSR related issues and participating in the decision-making of CSR reports. The BOE chairman (and the chairman of the executive committee) shall be the chairman of the committee, and all relevant vice presidents shall be members. As an independent organization for corporate social responsibility, the CSR management committee has a CSR promotion department, which is responsible for promoting the specific practice of CSR and communicating with the CSR duty officers from relevant organizations of the company. The annual CSR report of the company is released after the final approval of the board of directors'. The CSR Report Formulation Team identified 33 specialized topics as specified in the GRI Standards, it includes human rights assessment. Moreover, CSR Management Regulations for Suppliers 'put forward eight aspects of specific management requirements in human rights, child/underage/female labor, forced or compulsory labor, working hours and holidays, basic salary and social insurance, non-discrimination, freedom of association and communication, and the establishment of employee rights and benefits protection system'. [2019 Sustainability Report, 2020: waterdrop.cc] Score 2 <ul style="list-style-type: none"> • Met: Day-to-day responsibility: As indicated above, 'the CSR management committee has a CSR promotion department, which is responsible for promoting the specific practice of CSR and communicating with the CSR duty officers from relevant organizations of the company. The annual CSR report of the company is released after the final approval of the board of directors'. The CSR Report Formulation Team identified 33 specialized topics as specified in the GRI Standards, it includes human rights assessment. [2019 Sustainability Report, 2020: waterdrop.cc] • Not met: Day-to-day responsibility for ICT in supply chain
B.2.1	Identifying: Processes and triggers for identifying 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: Identifying risks in own operations: Although the Company has conducted materiality assessment, it is not clear if the Company considered the risks that are specific to locations or activities, covering the Company's operation. No further evidence found in the latest Sustainability Report. [Sustainability Report 2018, 2019: waterdrop.cc] • Not met: Identifying risks in ICT suppliers: Although the Company has a Supplier Performance Assessment, it is not clear it has a process to proactively identify human rights risks within its supply chain. [2019 Sustainability Report, 2020: waterdrop.cc]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			Score 2 <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
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 ICT 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 • Not met: Lessons learnt from checking effectiveness Score 2 <ul style="list-style-type: none"> • Not met: Both requirement under score 1 met
B.2.5	Communicating : Accounting for how human rights impacts are addressed	0	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 ICT suppliers Score 2 <ul style="list-style-type: none"> • Not met: Responding to affected stakeholders concerns • Not met: Ensuring affected stakeholders can access communications

Remedies and Grievance Mechanisms

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.1	Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers	1.5	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: The Company states: 'BOE has established effective complaint channels to prevent the incidents that would hurt employee rights and interests or discriminate against employees. Employees can report and complain through the employee representatives or the 'suggestion box' in written forms, which will be investigated and handled by professional departments'. [2019 Sustainability Report, 2020: waterdrop.cc] Score 2 <ul style="list-style-type: none"> • Met: Number grievances filed, addressed or resolved: It indicates that 'In 2019, there were no complaints associated with human rights, or cases of using child labor or forced labor happened in the company'. [2019 Sustainability Report, 2020: waterdrop.cc] • Not met: Channel is available in all appropriate languages • Not met: Expect ICT supplier to have equivalent grievance systems • Not met: Opens own system to ICT supplier workers
C.2	Grievance channel(s)/mechanism(s) to receive	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Grievance mechanism for community: According to the CSR report, the main methods of communications are 'Information disclosure, Field trip and

Indicator Code	Indicator name	Score (out of 2)	Explanation
	complaints or concerns from external individuals and communities		questionnaire survey, Public interest projects, Community volunteer activities'. Grievance mechanisms are not mentioned. No further evidence found in the latest Sustainability Report. [Sustainability Report 2018, 2019: waterdrop.cc] Score 2 <ul style="list-style-type: none"> • Not met: Describes accessibility and local languages • Not met: Expects ICT supplier to have community grievance systems • Not met: ICT supplier communities use global system
C.7	Remedying adverse impacts and incorporating lessons learned	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Describes how remedy has been provided • Not met: Says how it would remedy key sector risks Score 2 <ul style="list-style-type: none"> • Not met: Changes introduced to stop repetition • Not met: Approach to learning from incident to prevent future impacts • Not met: Evaluation of the channel/mechanism

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
E(1).0	Serious allegation No 1		No allegations meeting the CHRB severity threshold were found.

Disclaimer

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

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

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

company compares to other companies in the same industry today. The spirit of the exercise is to promote continual improvement via an open assessment process and a common understanding of the importance of the UN Guiding Principles on Business and Human Rights.

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