

Company Name Burberry
Industry Apparel (Supply Chain only)
UNGP Core Score (*) 17.5 out of 26

Score	Out of	For indicators
Governance and Policy Commitments		
2	2	A.1.1 Commitment to respect human rights
2	2	A.1.2 Commitment to respect the human rights of workers
2	2	A.1.4 Commitment to engage with stakeholders
2	2	A.1.5 Commitment to remedy
Embedding respect and Human Rights Due Diligence		
Embedding respect		
1.5	2	B.1.1 Embedding - Responsibility and resources for day-to-day human rights functions
Human Rights Due Diligence (HRDD)		
1.5	2	B.2.1 HRDD - Identifying: Processes and triggers for identifying human rights risks and impacts
2	2	B.2.2 HRDD - Assessing: Assessment of risks and impacts identified (salient risks and key industry risks)
1	2	B.2.3 HRDD - Integrating and Acting: Integrating assessment findings internally and taking appropriate action
0	2	B.2.4 HRDD - Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts
0.5	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
1.5	2	C.7 Remedying adverse impacts and incorporating lessons learned
17.5	26	

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

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

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

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

Detailed assessment

Governance and Policies

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1.1	Commitment to respect human rights	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Met: General HRs commitment: The Company states in its Humans Rights Policy that is committed to respecting and safeguarding the human rights of all the people whose lives are directly or indirectly impacted by Burberry. [Human Rights Policy, N/A: burberryplc.com] Met: UNGC principles 1 & 2: The Company is a signatory of the UN Global Compact since 2008 and have committed to respecting its 10 responsible business principles. [UN Global Compact - Communication: burberryplc.com] <p>Score 2</p> <ul style="list-style-type: none"> Met: UNGPs: Burberry states in its Human Rights report that is committed to respecting and upholding the UN Guiding Principles on Business and Human Rights. [Human Rights Policy, N/A: burberryplc.com]
A.1.2	Commitment to respect the human rights of workers	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Met: UNGC principles 3-6: The Company has a report called 'UN Global Compact communication', in which it describes how implement all the ten UNGC principles and explicitly states that they follow all the principles: "Burberry is a signatory of the UN Global Compact since 2008, and we continue to use the UN Global Compact's Ten principles to guide our business activity". [UN Global Compact - Communication: burberryplc.com] Met: Explicitly list ALL four ILO for AP suppliers: On its Modern Slavery & Transparency Supply Chain report, the Company says that all the suppliers and business partners must follow the Burberry's responsible business principles, also named as 'Ethical Trading Code of Conduct', which describes each of the ILO core labor standards. With respect freedom of association and collective bargaining, the Code also establishes alternative measures when these rights are restricted by law: 'Where the right to freedom of association and collective bargaining is restricted under law, the employer facilitates, and does not hinder, the development of parallel means for independent and free association and bargaining.' [Burberry Modern Slavery & Transparency in Supply Chain, 2017/18: burberryplc.com & Ethical Trading Code of Conduct, 12/05/2017: burberryplc.com] <p>Score 2</p> <ul style="list-style-type: none"> Met: Explicit commitment to All four ILO Core: On its Ethical Trading Code of Conduct, the Company has it own statements which includes the 4 ILO fundamental rights at work. It says that: "Workers, without distinction, have the right to join or form trade unions of their own choice and to bargain collectively"; "Under no circumstances shall Burberry nor any Business Associate use or in any way benefit from any form of Modern Slavery including but not limited to, forced, bonded or involuntary prison labor"; "There shall be no child labor."; "There shall be no discrimination in hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation." [Ethical Trading Code of Conduct, 12/05/2017: burberryplc.com] Met: Respect H&S of workers: Burberry reports on the Global Health and Safety Policy that "is committed to providing a safe, healthy environment for employees, customers and all those who visit or work on its premises. Burberry therefore manages its business in a way that is designed to ensure that we maintain the highest standards of health and safety which are reasonably achievable throughout our global operations." [Global Health and Safety Policy, 2018: burberryplc.com] Met: H&S applies to AP suppliers: On its Global Health and Safety Policy, Burberry has an explicit expectation to its suppliers to commit to Global Health and Safety Policy from the Company. [Global Health and Safety Policy, 2018: burberryplc.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Met: working hours for workers: It is described on the Ethical Trading Code of Conduct that working hours, excluding overtime, shall be defined by contract, and shall not exceed 48 hours per week. Also includes requirements on resting periods. [Ethical Trading Code of Conduct, 12/05/2017: burberryplc.com] • Met: Working hours for AP suppliers: It is clearly described on Ethical trade code of conduct that the standard provision that Burberry follow are also expected to all Business Associates, and as indicated above contains commitments on working hours including maximum time and rest periods. [Ethical Trading Code of Conduct, 12/05/2017: burberryplc.com]
A.1.4	Commitment to engage with stakeholders	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 to stakeholder engagement: The Company states in its Human Rights Policy that is committed to engaging with potential or affected stakeholders on the issue of human rights through interviews and dialogue with those who are affected by Burberry's operation. [Human Rights Policy, N/A: burberryplc.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Commits to engage stakeholders in design: In its website, on Human rights section, the Company discloses that "we engage with affected relevant stakeholder groups to better understand their needs and perceptions, get insight into the direct and indirect impacts of our business and develop focused mitigation plans". The Company describes an example that "on its product supply chain reliant on artisan craft and skills, the artisans and their communities are consulted on a regular basis to ensure that their views and priorities are included within the design and ongoing implementation of a project to promote their working conditions and livelihoods." [Company Website, Human Rights, N/A: burberryplc.com]
A.1.5	Commitment to remedy	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 to remedy: Burberry says in its Human Rights Policy that is 'committed to remedy any adverse impacts on individuals, workers and communities that we have caused or contributed to and recognize this should not obstruct access to any other remedies'. [Human Rights Policy, N/A: burberryplc.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Not obstructing access to other remedies: The Company states: 'We recognise the importance of collaboration in driving long-lasting positive change. We therefore work with supply chain partners, civil society, governments and other businesses to inform our approach, share key insights, help address root causes of human rights impacts and together work to achieve positive systemic change.' Furthermore, it indicates: 'We are committed to remedy any adverse impacts on individuals, workers and communities that we have caused or contributed to and recognise this should not obstruct access to any other remedies'. [Human Rights Policy, N/A: burberryplc.com] • Met: Collaborating with other remedy initiatives: It also states, 'Additionally, we are committed to working with our business associates to remedy adverse impacts which are directly linked to our operations, products or services and through collaborating with third-party NGOs or civil society on collaborative remedy initiatives where required. The affected stakeholders of any human rights concern will remain our foremost priority'. [Human Rights Policy, N/A: burberryplc.com] • Met: Work with AP suppliers to remedy impacts: The Company states in its Human Rights Policy that it is committed to working with its business associates to remedy adverse impacts which are directly linked to its operations, products or services and through collaborating with third-party NGOs or civil society as required and that the affected stakeholders of any human rights concern will remain its foremost priority. [Human Rights Policy, N/A: burberryplc.com]

Embedding Respect and Human Rights Due Diligence

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.1	Responsibility and resources for day-to-day human rights functions	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 ILO core conventions: Please, see indicator A.1.2. The Company is signatory to the UN Global Compact. [Human Rights Policy, N/A: burberryplc.com] • Met: Senior responsibility for HR: "The implementation of Human and Labour Rights is overseen by the Chair of the Ethics Committee, who has operational responsibility for Human and Labour Rights and reports into the CEO and the Board." [Human Rights Policy, N/A: burberryplc.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> • Met: Day-to-day responsibility: The Company states that "Responsibility for the policy lies with Burberry's Chief Executive Officer, while our Chief Human Resources Officer and global HR team ensure that the policy is upheld in our direct operations". [Company Website, Human Rights, N/A: burberrypc.com] • Not met: Day-to-day responsibility for AP in supply chain: The Company states: 'Responsibility for the policy lies with Burberry's Chief Executive Officer, while day-to-day operational responsibility lies with our Chief People Officer and global HR team, who ensure that the policy is upheld in our direct operations. The Vice President of Corporate Responsibility reports to the Chief Executive Officer and is responsible for overseeing human rights in our supply chain'. Additionally: 'Human rights risks are reported via the Burberry Ethics Committee, chaired by the General Counsel, and attended by the Company Secretary, Senior Vice President of Risk Management and Audit, Vice President of Corporate Responsibility and Director of Asset and Profit Protection. The Ethics Committee reports to the Risk Committee, which reports to the Audit Committee at Board level'. However, there is no description about how the management of human rights issues on supply chain is made, as current evidence just seems to indicate that VP Corporate responsibility is responsible for oversight in supply chain.. [Company Website, Human Rights, N/A: burberrypc.com]
B.2.1	Identifying: Processes and triggers for identifying human rights risks and impacts	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Identifying risks in own operations: The Company has a Human Rights Materiality Analysis which identifies the main human rights risks that might arise during its business activities. Additionally, Burberry reviewed all of its operations (whether direct or indirect) and their potential impact on human rights, having identified four focus stakeholder groups: direct workers, supply chain workers, local communities and customers. [Human Rights Policy, N/A: burberrypc.com] • Met: Identifying risks in AP suppliers: In the Human Rights Materiality Analysis is indicated that both direct and indirect operations are reviewed for potential human rights risks. [Human Rights Policy, N/A: burberrypc.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Ongoing global risk identification: The Company states: 'We recognise that systemic labour rights issues exist within global fashion supply chains, this is why we have developed a robust monitoring system of our supply chain over the last 15 years'. Additionally, the Company discloses: 'Burberry will monitor human rights impacts on an ongoing basis, e.g. through the implementation of the Burberry Ethical Trading Code of Conduct through the company's Ethical Trading Programme consisting of audits, which cover all finished goods manufacturing facilities, their subcontractors and key raw material suppliers. Audits, announced or unannounced, consist of worker interviews, document reviews and site tours, and are repeated periodically to confirm ongoing compliance and continuous improvement'. However, this indicator looks for ongoing process to identify potential risks and impacts. Current evidence seems to refer to monitoring compliance with existing policies and risks already identified. [Human Rights Policy, N/A: burberrypc.com & Human Rights Impact Assessment, N/A: burberrypc.com] • Met: In consultation with stakeholders: Burberry states on the Human Rights Impacts Assessments that it conducts interviews with affected stakeholder groups to better understand their needs and perceptions, understand the direct and indirect impacts of its business and has a process to map the operation to identify stakeholder groups and the most salient potential human rights impacts in relation to them. [Human Rights Impact Assessment, N/A: burberrypc.com] • Met: In consultation with HR experts: In the report Human Rights Impacts Assessments Burberry says that "risks and mitigation plans have been reviewed by Ergon, a specialist consultancy in the field of human rights, and discussed with Oxfam, a globally renowned aid and development charity". [Human Rights Impact Assessment, N/A: burberrypc.com] • Not met: Triggered by new circumstances: The Company states: 'New operations and projects are also assessed for human rights risks and impacts when they are initiated as part of our ethical trading programme. We have completed three impact assessments since 2014, each process involving mapping our own operations and those of our extended supply chain, and assessing them in terms of their potential impact on human rights as set out in the Universal Declaration of Human Rights'. However, no further details against how new circumstances are considered in the global human rights risk identification system. [Company Website, Human Rights, N/A: burberrypc.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.2	Assessing: Assessment of risks and impacts identified (salient risks and key industry risks)	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Salient risk assessment (and context): In its Human Rights Impacts Assessment, Burberry describes its process of mapping its direct and indirect operations' exposure to human rights risks, taking into consideration geographical, economical and social factors. As a result, the Company identified key stakeholder groups and the most prominent human rights potential impacts. [Human Rights Impact Assessment, N/A: burberryplc.com & Transparency in the supply chain and modern slavery statement, 09/05/2019] • Met: Public disclosure of salient risks: The company states that "in 2014 we conducted a Human Rights Impact Assessment of our operations and activities and those of our extended supply chain, to identify and address potential risks. We reviewed this assessment in 2016, to capture emerging risks in relation to new operations and projects and to develop mitigation plans as required. Over the last year, to strengthen our efforts in this field even further, we have developed long term strategies for key themes arising from our 2018/19 Human Rights Impact Assessment, including migrant workers, income vulnerable workers, diversity and inclusion." [Transparency in the supply chain and modern slavery statement, 09/05/2019 & Human Rights Impact Assessment, N/A: burberryplc.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Both requirements under score 1 met
B.2.3	Integrating and Acting: Integrating assessment findings internally and taking appropriate action	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Action Plans to mitigate risks: The Company discloses: 'To ensure compliance with the policy, we assess human rights impacts and monitor labour conditions across our own operations and extended supply chain on a regular basis through our ethical trading programme, which is delivered by an established global team of ethical trading experts.' Additionally, it states: 'During ethical trade audits and as part of our broader Responsibility programme, we conduct interviews with relevant stakeholder groups to better understand their needs and perceptions, while gathering insights into the direct and indirect impacts of our business and developing focused mitigation plans where required. For example, we provide grievance mechanisms for our global employees, as well as confidential hotlines run by non-governmental organisations (NGOS) for workers in our supply chain. Currently, more than 13,000 workers across 31 factories are provided with improved access to remedy and confidential support, including advice and information on workers' rights and wellbeing.' However, it is not clear how the company assess its human rights risks and the action plan it has in place to mitigate it. [Company website, Human Rights Policy, N/A: burberryplc.com] • Met: Including in AP supply chain: See above, the Company indicates that 'we have identified key themes arising from our FY 2018/19 Human Rights Impact Assessment. We will continue our work in enhancing the lives of migrant workers and income-vulnerable workers, as well as promoting diversity and inclusion within our supply chain. In FY 2019/20, we further embedded these work streams into our broader Responsibility strategy. [...] During ethical trade audits and as part of our broader Responsibility programme, we conduct interviews with relevant stakeholder groups to better understand their needs and perceptions, while gathering insights into the direct and indirect impacts of our business and developing focused mitigation plans where required'. [Company website, Human Rights Policy, N/A: burberryplc.com] • Met: Example of Actions decided: "Mitigation plans have been developed and are being implemented and continually monitored (...) As an example, where we identified salient human rights risks within factories, we provide confidential, local NGO-run hotlines in relevant languages for workers in our supply chain". [Human Rights Impact Assessment, N/A: burberryplc.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met
B.2.4	Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: System to check if Actions are effective: The Company states that it monitors the implementation of the Ethical Trading Code of Conduct through a variety of methods including audits and site visits. However, no evidence found on whether it has a system to check if actions taken in response o human rights impacts and risks assessed have been effective. The Company has provided comments to CHRB regarding this indicator. However, this document or its content has not been found in publicly available sources. [Ethical Trading Code of Conduct, 12/05/2017: burberryplc.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • 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	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Comms plan re identifying risks: See indicator B.2.1. The Company carries out a global risk identification and assessment process that includes both its own operations and business partners, and describes at least some features of the process. [Human Rights Policy, N/A: burberryplc.com] • Not met: Comms plan re assessing risks: See indicator B.2.2 • Not met: Comms plan re action plans for risks: In order to be awarded this indicator, the Company has to achieve a full score in B.2.3 • Not met: Comms plan re reviewing action plans: In order to be awarded this indicator, the Company has to achieve a full score in B.2.4 • Not met: Including AP suppliers: In order to be awarded this indicator, the Company has to achieve a full score in B.2.2/B.2.3/B.2.4 and at least 1,5 points in B.2.1 Score 2 <ul style="list-style-type: none"> • Not met: Responding to affected stakeholders concerns: Burberry says that it will investigate what is reported by local stakeholders and resolve it, when appropriate. However, no further information found on the communication process it takes to respond to affected stakeholders. [Burberry Local Stakeholder Engagement Policy, 2017: burberryplc.com] • Not met: Ensuring affected stakeholders can access communications: The Company does not explain how it ensures that stakeholders will be able to access the Company's disclosures against its impacts, risks identified and assessment. [Local Stakeholder Engagement Policy, 2017: burberryplc.com]

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: Burberry says in its Human Rights Policy that provides a helpline called Burberry Confidential, that is available to all employees, where they can report, anonymously, any concerns relating to malpractice, with all cases treated in the strictest confidence. Burberry expects its suppliers to have similar mechanisms to allow workers to anonymously raise concerns and grievances. [Human Rights Policy, N/A: burberryplc.com] Score 2 <ul style="list-style-type: none"> • Not met: Number grievances filed, addressed or resolved: Although the Company indicates that 'During FY 2019/20, Burberry-sponsored hotlines received 598 calls (categorised as 26 complaints, 533 consulting requests and 39 psychological support requests) and their resolutions have been monitored closely by our Responsibility team. In cases where remedy is required, we ensure we work with local expert organisations to provide resolution', it does not say however, how many were related to human rights. [Company Website, Human Rights, N/A: burberryplc.com & Transparency in the supply chain and modern slavery statement, 09/05/2019] • Not met: Channel is available in all appropriate languages: Regarding its supply chain, the Company states: 'Currently, more than 13,000 workers across 31 factories are provided with improved access to remedy and confidential support, including advice and information on workers' rights and wellbeing. The hotline is available in all the appropriate languages in the 31 factories. The effectiveness of these hotlines is regularly reviewed. During FY 2019/20, Burberry-sponsored hotlines received 598 calls and their resolutions have been monitored closely by our Responsibility team. In cases where remedy is required, we ensure we work with local expert organisations to provide resolution'. However, there are no further details against the Company's own workers channel. [Company Website, Human Rights, N/A: burberryplc.com] • Met: Expect AP supplier to have equivalent grievance systems: Through its Ethical Trading Programme, Burberry upholds the rights for all workers in the supply chain to freely join a trade union. Burberry also requires factories to provide a grievance mechanism that is communicated to, understood by and applied fairly to their employees. This is verified by the activities of the Ethical Trading Programme. Also, Burberry Confidential is extended to our supply chain allowing those working to report any concerns relating to malpractice anonymously with all cases treated in the strictest confidence. [Human Rights Policy, N/A: burberryplc.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
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: On its website the Company provide some contacts that communities can access, but there is no mention that these external stakeholders can access the grievance mechanism channel. Also, on its Local Stakeholder Engagement Policy there is no evidence how communities can access its grievance mechanisms to make complaints. [Burberry Local Stakeholder Engagement Policy, 2017: burberryplc.com & Company website, Contacts, 2019: burberryplc.com] <p>Score 2</p> <ul style="list-style-type: none"> Not met: Describes accessibility and local languages: The Company states: 'Our Local Stakeholder Engagement Policy applies when a local stakeholder reports an issue or risk that has arisen due to Burberry operations or activities. For example, issues may relate to littering, noise, lighting in offices or stores, obstructions, behaviour of employees/customers in the local area, construction work etc. Local stakeholders can contact Burberry in store or online by contacting coporate.responsibility@burberry.com'. However, there are no descriptions against accessibility to all stakeholders, related to local languages, for example. [Local Stakeholder Engagement] Not met: Expects AP supplier to have community grievance systems: The Company states: 'In FY 2019/20, we introduced an inclusivity programme in Italy with a third-party communication agency and a cultural mediator association to increase vulnerable workers' access to local institutions and public services. The overall aim of the programme is to empower workers, thereby reducing risk of modern slavery and in the long run, have a positive impact on social inclusion. The programme utilises social media platforms to connect vulnerable people to over 40 local institutions and services'. However, it is not clear if the company has a grievance mechanism where communities can raise concerns against the company and/or supplier operations. [Transparency in the supply chain and modern slavery statement, 09/05/2019] Not met: AP supplier communities use global system
C.7	Remedying adverse impacts and incorporating lessons learned	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: Describes how remedy has been provided: The company states that 'through this year's audits of the product and licensee supply chains, we have identified instances at 9 facilities where workers have paid fees for recruitment. We have worked with facility management to ensure workers were refunded. We also identified two facilities where management was holding worker passports. Both instances were resolved within a few days and workers' identity documentation returned. In a more recent source it also indicates that 'Through this year's audits of the product and licensee supply chains, we have identified instances at 11 facilities where workers have paid recruitment related fees, specifically for pre-employment health checks. We have worked with the facilities' management teams to ensure workers were refunded. [Burberry Modern Slavery & Transparency in Supply Chain, 2017/18: burberryplc.com & Transparency in the supply chain and modern slavery statement, 09/05/2019] <p>Score 2</p> <ul style="list-style-type: none"> Met: Changes introduced to stop repetition: See above. Following these cases, the Company indicates that 'To prevent future issues, we continue to work with our suppliers to review recruitment journeys and develop fee free recruitment chains. In addition, in an area of our supply chain where we identified a group of migrant workers paying fees during a complex recruitment journey, we have been working with a local NGO, Issara Institute, and two suppliers who operate four facilities to build worker voice and remediate any fees paid by existing workers, whilst developing an ethical recruitment route for workers in the future'. [Transparency in the supply chain and modern slavery statement, 09/05/2019 & Burberry Modern Slavery & Transparency in Supply Chain, 2017/18: burberryplc.com] Not met: Evaluation of the channel/mechanism: The Company states: 'Through this year's audits of the product and licensee supply chains, we have identified instances at 11 facilities where workers have paid recruitment related fees, specifically for pre-employment health checks. We have worked with the facilities' management teams to ensure workers were refunded. To prevent future issues, we continue to work with our suppliers to review recruitment journeys and develop fee free recruitment chains. Additionally, it states: 'in an area of our supply chain where we identified a group of migrant workers paying fees during a complex recruitment journey, we have been working with a local NGO, Issara Institute, and two suppliers who operate four facilities to build worker voice and remediate any fees paid by existing workers, whilst developing an ethical recruitment route for

Indicator Code	Indicator name	Score (out of 2)	Explanation
			workers in the future'. However, no further details against an evaluation of the mechanism established. [Transparency in the supply chain and modern slavery statement, 09/05/2019]

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
E(1).0	Serious allegation No 1		<ul style="list-style-type: none"> • Headline: Burberry to pay USD 2.45 million to settle overtime lawsuit • Area: Working hours • Story: In July 2017, Burberry has agreed to pay USD 2.54 million to 643 of its USA workers to settle a lawsuit on overtime work. Employees of various departments, from sales managers to beauty consultants and dispatch workers, asserted they were forced to carry out free overtime work, from half an hour to an hour every evening, to clean the stores or perform other menial tasks. • Sources: [New York Post - 17/6/2017: nypost.com][Top Class Actions - 15/8/2017: topclassactions.com][Fashion Network - 19/7/2017: us.fashionnetwork.com]
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 has not responded to the unpaid overtime hours allegation directly, but it has settled the lawsuit agreeing to pay USD 2.54 million to 643 workers in the USA. <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	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: Company policies address the general issues raised: Burberry states that all of its entities and supply chain partners are expected to comply with all applicable laws and human rights standards included in its Human Rights Policy. Additionally, Burberry states "We are committed to, and require all our supply chain partners to commit to, respecting and upholding the human rights principles set out in the ILO Conventions on Labour Standards on Working Hours." [Human Rights Impact Assessment, N/A: burberryplc.com] • Met: Policies apply to the type of business relationships involved: Burberry states that it is committed to the ILO Conventions on Labour Standards on Working Hours. [Human Rights Impact Assessment, N/A: burberryplc.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Policies address the specific rights in question: Burberry states that "Working hours must comply with national laws, collective agreements, and the provisions of paragraphs 6I to 6VI below, whichever affords the greater protection for workers. Paragraphs 6I to 6VI are based on international labour standards." This policy applies to Burberry's own operations and its supply chain. [Ethical Trading Code of Conduct, 12/05/2017: burberryplc.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: There is no evidence that Burberry publicly engaged with stakeholders but it is awarded a point as the company has settled out of court in response to the allegations of unpaid overtime work. [NY Post article about out of court settlement, 2017: nypost.com] • Met: Provides remedies to affected stakeholders: Burberry has settled the class action lawsuit related to unpaid overtime allegations in the USA. The settlement totalled USD 2.54 million for 643 people. [NY Post article about out of court settlement, 2017: nypost.com] • Not met: Has reviewed management systems to prevent recurrence: There is no evidence to suggest that Burberry has reviewed its management systems in light of the overtime allegations and it accepted no liability in the out of court statement, there is no further evidence of improvements. <p>Score 2</p> <ul style="list-style-type: none"> • Met: Remedies are satisfactory to the victims: Burberry has settled the class action lawsuit related to unpaid overtime allegations in the USA. The settlement totalled USD 2.54 million for 643 people. [NY Post article about out of court settlement, 2017: nypost.com] • Not met: Has improved systems and engaged affected stakeholders

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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