

Company Name Canon
Industry ICT (Own operations and Supply Chain)
UNGP Core Score (*) 8.0 out of 26

Score	Out of	For indicators
Governance and Policy Commitments		
2	2	A.1.1 Commitment to respect human rights
0.5	2	A.1.2 Commitment to respect the human rights of workers
2	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
1.5	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
8.0	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	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 to 'Respect fundamental human rights and prohibit discrimination based on such factors as race, nationality, gender, religion and creed.' [CSR Basic Statement, 05/2017: global.canon] • Met: UDHR: In addition, it indicates: 'Canon respects the following international initiatives and complies with them in line with the above basic statement: Universal Declaration of Human Rights; UN Guiding Principles on Business and Human Rights; International Labor Organization (ILO) Declaration on Fundamental Principles and Rights at Work; Organization for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises' [CSR Basic Statement, 05/2017: global.canon] <p>Score 2</p> <ul style="list-style-type: none"> • Met: UNGPs: See above [CSR Basic Statement, 05/2017: global.canon] • Met: OECD: See above [CSR Basic Statement, 05/2017: global.canon]
A.1.2	Commitment to respect the human rights of workers	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: ILO Core: The Company indicates that Canon respects global standards such as the UN's "Guiding Principle on Business and Human Rights" and the "International Labor Organization (ILO) Declaration on Fundamental Principles and Rights at Work". [Respecting Human Rights, N/A: global.canon] • Not met: Explicitly list ALL four ILO for ICT suppliers: Its Supplier CSR Guidelines includes clear provisions for all ILO core except freedom of association and collective bargaining, where it indicates: 'Promote sincere dialogue between employees and management in accordance with the laws and regulations of the country/region of location'. However, it is not clear whether the Company is requiring to respect those rights in all contexts, as it indicates 'in accordance with the laws' (i.e. alternative mechanisms for those countries where there are legal restrictions to the exercise of these rights). [Supplier CSR Guidelines, 07/2018: global.canon] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Explicit commitment to All four ILO Core: In its CSR Basic Statement, the Company includes the following provisions: Respect fundamental human rights and prohibit discrimination based on such factors as race, nationality, gender, religion and creed; Prohibit child labor and forced labor (including human trafficking); Promote sincere dialogue between employees and management in accordance with the laws and regulations of each region'. In addition, on its website section 'Respecting Human Rights', the Company states: 'Canon respects workers' basic rights, including freedom of association and collective bargaining. We also strive to address various issues by promoting dialogue between labor and management. For example, the labor agreement between Canon Inc. and the Canon Workers' Union commits both sides to work in good faith to peacefully resolve issues in a timely manner. In addition, in the Canon Group CSR Basic Statement, we clarify our intent to promote sincere dialogue between management and employees in compliance with the laws and regulations of countries and regions where we operate'. However, the Company refers to freedom of association and collective bargaining in the contexts of laws and regulations. Considering this, it is not clear whether the Company would support alternative measures or equivalent worker bodies in locations where these rights are restricted under local laws. Although the website refers to freedom of association and collective bargaining generally, which is sufficient, it is assumed that the CSR statement is the formal position. As indicated above, when Companies refer to these rights in the context of local laws, it is expected to clarify that supports alternative measures in locations where the

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>exercise of these rights are restricted under local law. [CSR Basic Statement, 05/2017: global.canon & Respecting Human Rights, N/A: global.canon]</p> <ul style="list-style-type: none"> • Met: Respect H&S of workers: The Company states that it ensures 'occupational health and safety, and prevent occupational injuries' [CSR Basic Statement, 05/2017: global.canon] • Met: H&S applies to ICT suppliers: In its Supplier CSR Guidelines, the Company asks its suppliers to 'Ensure occupational health and safety at the workplace, and prevent occupational injuries'. [Supplier CSR Guidelines, 07/2018: global.canon] • Not met: working hours for workers: The Company states, in its CSR Basic Statement, that it aims to 'Prevent excessive overtime work and grant appropriate holidays'. Also, in its 2020 Sustainability Report, it indicates that 'Canon works diligently to ensure that employee work hours comply with the laws of each country and region where it operates, targeting reductions in hours where appropriate'. However, no commitment found to respect ILO Conventions on working hours or more in detailed commitments (standard week hours, maximum overtime hours, minimum breaks). [CSR Basic Statement, 05/2017: global.canon & 2020 Sustainability Report, 07/2020: global.canon] • Not met: Working hours for ICT suppliers: In its Supplier CSR Guidelines, the Company asks its suppliers to 'Prevent excessive overtime work and grant appropriate holidays', however, there is no mention to respect ILO Convention on labour standards on working hours or more in detail information, including standard weekly hours, breaks, overtime. [Supplier CSR Guidelines, 07/2018: global.canon]
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: Regular stakeholder engagement: The Company discloses information about its stakeholder engagement activities in its Sustainability Report 2020 and indicates that 'Canon thinks it is important to have ongoing dialogue with its diverse stakeholders to communicate the company's thinking to them and to listen carefully to their feedback with the aim of deepening mutual understanding'. Stakeholders listed and for which it reports engagement activities include: Employees, Local Communities, Suppliers, among others. [2020 Sustainability Report, 07/2020: global.canon] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Regular stakeholder design engagement: The Company indicates that 'every month, Canon Inc. convenes a Central Worker/Management Conference with the Canon Workers' Union to exchange opinions and information spanning a range of subjects. The CEO and senior management attend the monthly conferences. Additionally, special committees have been established to consider wages, working hours, safety and health issues, and benefit programs. Based on these conferences, new systems are established and policies enacted'. [2020 Sustainability Report, 07/2020: global.canon]
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 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	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Commits to ILO core conventions: See indicator A.1.2. The Company is committed to respect ILO Declaration. • Not met: Senior responsibility for HR: In its Sustainability Report 2020, the Company indicates: 'At Canon, the CSR Division coordinates CSR-related activities across the Group (...). The CSR Division reports on CSR-related matters to the director in charge of CSR as needed and receives relevant instructions'. However, it is not clear the specific senior person/role responsible for human rights issues, as it is not specified to which person/body does 'the director in charge of CSR' refers. No evidence found in public sources of senior person/role in charge with accountability for human rights (alone or together with other issues). [2020 Sustainability Report, 07/2020: global.canon]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> • Met: Day-to-day responsibility: At Canon, 'the CSR Division coordinates CSR-related activities across the Group, working together with other relevant divisions to address any CSR-related issues that require inter-departmental cooperation, such as environmental, quality, procurement, human resource, facilities management, legal, IR or PR issues. In fields with high societal expectations, such as environmental protection, compliance, or quality management, our response is led by the division in charge of the relevant area. The CSR Division reports on CSR-related matters to the director in charge of CSR as needed and receives relevant instructions'. [2020 Sustainability Report, 07/2020: global.canon] • Not met: Day-to-day responsibility for ICT in supply chain: The Company indicates in its Sustainability Report 2020: 'Canon not only complies with laws and regulations on procurement globally, but also ensures complete fairness and transparency in dealings with its suppliers. (...) To ensure companywide consistency and uniformity, sections charged with internal control have been set up within procurement divisions to maintain the rules, monitor compliance, and provide training for employees'. However, although the Company discloses how it handles suppliers in terms of social responsibility (and human rights), no further details found on how responsibility and day-to-day management of supply chain and human rights is allocated within the Company. [2020 Sustainability Report, 07/2020: global.canon]
B.2.1	Identifying: Processes and triggers for identifying 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: Identifying risks in own operations: The Company has a Risk Management System, which 'develops various measures to promote the Group's risk management activities, including identifying any significant risks (violations of laws and regulations, inappropriate financial reporting, quality issues or information leaks, etc.) that the Group may face in the course of business'. Moreover, 'Canon conducts wide-ranging risk assessments to identify all operations that have a high risk of injury, illness or accident'. However, no evidence found describing its specific processes to identify its human rights risks and impacts (human rights due diligence). [2020 Sustainability Report, 07/2020: global.canon] • Not met: Identifying risks in ICT suppliers: The Company indicates, in its 2020 Sustainability Report, that it 'exercises due diligence to identify any risk of funding armed groups relating to conflict minerals. The surveys utilize the Conflict Minerals Reporting Template (CMRT), an industry standard published by the Responsible Minerals Initiative (RMI)'. Moreover, in its tab Supply Chain Management, it states that 'Regarding major suppliers in particular, Canon is also working on identifying risks regarding human rights, health and safety, environment and ethics. This process will be done by completing the RBA Self-Assessment Questionnaire'. However, due diligence for conflict minerals is assessed in its specific indicator. This looks for evidence of human rights due diligence in the supply chain excluding conflict minerals affected. [2020 Sustainability Report, 07/2020: global.canon & Supply Chain Management, N/A: global.canon] <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
B.2.2	Assessing: Assessment of risks and impacts identified (salient risks and key industry risks)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Salient risk assessment (and context): The Company indicates that 'Since 2013, we have been conducting yearly investigations at our main overseas manufacturing companies, primarily in Asia, to confirm their compliance with laws pertaining to minimum working age and health considerations. (...) To date, no Canon Group company has violated laws relating to child labor or forced labor'. However, no evidence found of a description of the Company's due diligence process, including the assessment of salient human rights issues. [Respecting Human Rights, N/A: global.canon] • Not met: Public disclosure of salient risks: In its Sustainability Report 2020, the Company states that 'Among aspects of social responsibility, child labor and forced labor in particular are areas of growing concern'. However it is not clear whether those are its salient human rights issues determined following due diligence. [2020 Sustainability Report, 07/2020: global.canon] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met

Indicator Code	Indicator name	Score (out of 2)	Explanation
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: The Company explains that 'in 2005, Canon Inc. formulated an action plan following the guidelines of Japan's Ministry of Health, Labour and Welfare. Based on this plan, we are encouraging the adoption of flexible work styles while helping employees achieve work-life balance, and taking steps to aid the development of the next generation'. However, it is not clear that this is an action taken as a result of salient human rights assessment and to face an acknowledged salient issue. [2020 Sustainability Report, 07/2020: global.canon] 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 that 'Canon Inc. has established a Compliance Hotline system to receive information related to compliance issues. The confidentiality of reporters is strictly maintained, and they are guaranteed not to suffer any unfair treatment for using the system. We continually work to encourage appropriate use of the system by expounding the purpose of the system through such means as the intranet compliance website and compliance training, etc'. In addition, the Company's engagement channel with employees include 'Whistleblower system'. [2020 Sustainability Report, 07/2020: global.canon]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> • Not met: Number grievances filed, addressed or resolved: The Company states in its Corporate Governance Overview that 'In the current business term, there were no whistleblower reports relating to serious violations of laws and regulations, or the like'. In addition, the Company indicates in its Conflict Mineral Report 2019: 'As an early-warning risk-awareness system for conflict minerals specified in the OECD Guidance, Canon Inc. established a grievance mechanism — "Contact Point for Reporting Concerns Regarding Conflict Mineral Issues" — on its official website in 2015. No reports from employees, suppliers, or other stakeholders were received by the contact point in 2019'. Regarding its Compliance Hotline System, the Company indicates, in its 2020 Sustainability Report, that, 'Over the past few years, the total number of cases filed using the system at Group companies overall has been around 300-400 per year'. Canon Inc. receives biannual reports from Group companies on the operational status of their respective Compliance Hotline systems, 'These biannual reports from each company include not only the number of cases filed, but also a summary of each case, the results of investigation and response, and measures to prevent recurrences'. However, no information found about the total number of grievances related to human rights received, addressed or resolved from all channels, including the Hotline. [Corporate Governance Overview, 03/2019: global.canon & 2019 Form SD, 28/05/2020: global.canon] • Not met: Channel is available in all appropriate languages • Met: Opens own system to ICT supplier workers: The Company indicates in its Supplier CSR Guidelines: 'In order to go on to fulfil its social responsibility in its supply chain as well as in the Canon Group, Canon is endeavoring to elicit understanding from each of its suppliers with regards to the company's basic stance towards procurement activities. Should anyone have any specific concerns or information regarding human rights, labor, health and safety and other similar issues in Canon's supply chain, including but not limited to the occurrence of child labor or forced labor, please contact us using the "Feedback on CSR Activities" page on Canon Inc.'s website. Canon will perform investigation based on the information that it receives through that page.' [Supplier CSR Guidelines, 07/2018: global.canon]
C.2	Grievance channel(s)/mechanism(s) to receive complaints or concerns from external individuals and communities	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: Grievance mechanism for community: The Company indicates in its Conflict Mineral Report 2018: 'As an early-warning risk-awareness system for conflict minerals specified in the OECD Guidance, Canon Inc. established a grievance mechanism — "Contact Point for Reporting Concerns Regarding Conflict Mineral Issues" — on its official website in 2015. No reports from employees, suppliers, or other stakeholders were received by the contact point in 2019'. In addition, it is possible to send 'Inquiries about its CSR Activities' through its website. As indicated below is open to anyone and allows to report concerns in relation to supply chain. [Inquiries about CSR Activities, N/A: global.canon & 2019 Form SD, 28/05/2020: global.canon] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Describes accessibility and local languages: Although portal for inquires is online, is not clear if it is available in all appropriate languages. • Not met: Expects ICT supplier to have community grievance systems • Met: ICT supplier communities use global system: In its Supplier CSR Guidelines, the Company indicates: 'In order to go on to fulfil its social responsibility in its supply chain as well as in the Canon Group, Canon is endeavoring to elicit understanding from each of its suppliers with regards to the company's basic stance towards procurement activities. Should anyone have any specific concerns or information regarding human rights, labor, health and safety and other similar issues in Canon's supply chain, including but not limited to the occurrence of child labor or forced labor, please contact us using the "Feedback on CSR Activities" page on Canon Inc.'s website. Canon will perform investigation based on the information that it receives through that page'. [Supplier CSR Guidelines, 07/2018: global.canon]
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: Canon Inc. 'receives biannual reports from Group companies on the operational status of their respective Compliance. (...) These biannual reports from each company include not only the number of cases filed, but also a summary of each case, the results of investigation and response, and measures to prevent recurrences. Each Group company takes the necessary corrective measures and recurrence prevention measures based on the investigation results'. However, no description of the approach/actions it took

Indicator Code	Indicator name	Score (out of 2)	Explanation
			to provide or enable a timely remedy for its victims found. [2020 Sustainability Report, 07/2020: global.canon] <ul style="list-style-type: none"> • 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		<ul style="list-style-type: none"> • Headline: Apple and others named as supplier North Mara Gold Mine faces allegations of pollution and violence in Tanzania • Area: Right to security • Story: On June 18th, 2019, news outlets in several countries simultaneously released the results of investigations by a consortium of journalists, Forbidden Stories, into human rights and environmental abuses at Barrick Gold's North Mara gold mine in Tanzania, confirming six years of investigations, reported on yearly by MiningWatch Canada, into assaults on men, women and children by the mine's private security and by police contracted by the mine. There have been injury cases including loss of limbs, loss of eyesight, broken bones, and internal injuries. Additionally, the consortium highlighted attacks on journalists who have tried to report on human rights abuses at the mine. At least a dozen local and foreign reporters were censored or threatened, and this is why Forbidden Stories has decided to investigate Acacia Mining's activity in the mine. The consortium also exposed how the gold from this mine is refined in India and Switzerland before being sold to, among others, international electronic companies. In June 2019, at the annual shareholders meeting, human rights campaigners called for independent and transparent assessment of grievance claims and an end to the memorandum of understanding with police. • Sources: [Ghana Business News - 20/06/2019: ghanabusinessnews.com][The Guardian - 18/06/2019: theguardian.com][Ghana Business News - 19/06/2019: ghanabusinessnews.com]
E(1).1	The Company has responded publicly to the allegation	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Public response available: According to the press, a spokesperson for the Company stated 'We are not aware of any relationship between human rights abuse mining in Tanzania and MMTC-PAMP India. We will carefully review your report after it is published and then consult with the RMI (of which Canon is a member) to take appropriate steps as necessary'. [Tech firms to check suppliers after mining revelations in Tanzania, 18/6/2019: theguardian.com] Score 2 <ul style="list-style-type: none"> • Not met: Response goes into detail
E(1).2	The Company has appropriate policies in place	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Company policies address the general issues raised: The Company's policy is aligned with the Universal Declaration of Human Rights, which includes the right to security. [CSR Basic Statement, 05/2017: global.canon] • Not met: Policies apply to the type of business relationships involved Score 2 <ul style="list-style-type: none"> • Not met: Policies address the specific rights in question
E(1).3	The Company has taken appropriate action	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Engages with affected stakeholders • Not met: Provides remedies to affected stakeholders • Not met: Has reviewed management systems to prevent recurrence Score 2 <ul style="list-style-type: none"> • Not met: Remedies are satisfactory to the victims • Not met: Has improved systems and engaged affected stakeholders

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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