

Company Name Coles Group
Industry Agricultural Products (Supply Chain only)
UNGP Core Score (*) 17.0 out of 26

Score	Out of	For indicators
Governance and Policy Commitments		
1	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
1	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
1.5	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
17.0	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	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: General HRs commitment: On its human rights website, the Company indicates that 'we are committed to respecting human rights across everything we do. People are central to our business and we impact daily lives of many including our team members, customers, suppliers, workers in our supply chains and the communities in which we live and work'. [Human Rights at Coles, N/A: colesgroup.com.au] • Not met: International Bill of Rights <p>Score 2</p> <ul style="list-style-type: none"> • Not met: UNGPs: On its human rights website, the Company states that 'our approach to managing human rights reflects the principles of 'the UN Guiding Principles on business and human rights'. However, the use of 'reflects the principles' is not considered a formal statement of commitment according to CHRB wording criteria. In addition, the Company's ethical sourcing indicates that this policy and supplier requirements are 'based on' codes of practice that include 'UN Guiding Principles on Business and Human Rights'. However, the use of 'based on' is not considered a formal statement of commitment according to CHRB wording criteria. No further evidence found. [Ethical Sourcing Policy, 03/2020: colesgroup.com.au & Human Rights at Coles, N/A: colesgroup.com.au] • Not met: OECD: The Company's ethical sourcing indicates that this policy and supplier requirements are 'based on' codes of practice that include 'OECD Guidelines for Multinational Enterprises'. However, the use of 'based on' is not considered a formal statement of commitment according to CHRB wording criteria. No further evidence found. [Ethical Sourcing Policy, 03/2020: colesgroup.com.au]
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 is signatory of the UNGC. [Human Rights at Coles, N/A: colesgroup.com.au] • Met: Explicitly list All four ILO for AG suppliers: The Company's 'Ethical sourcing policy' contains explicit requirements in relation to discrimination, child labour, forced labour, freedom of association and collective bargaining. In relation the last one, the code indicates that 'suppliers acknowledge that workers have a right to freedom of association and to bargain collectively'. 'Where the right to freedom of association and collective bargaining are restricted under local laws, suppliers will not hinder the development of alternative means of independent and free association and bargaining'. [Ethical Sourcing Policy, 03/2020: colesgroup.com.au & Ethical Sourcing Remediation Framework, 06/2020: colesgroup.com.au] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Explicit commitment to All four ILO Core: The Company states on its human rights website that, 'as a signatory to the UN Global Compact, we are committed to upholding its 10 principles including its labour principles: [...] Business should uphold the freedom of association and the effective recognition of the right to collective bargaining, business should uphold the elimination of all forms of forced and compulsory labour, business should uphold the effective abolition of child labour, business should uphold the elimination of discrimination in respect of employment and occupation'. [Human Rights strategy, N/A: colesgroup.com.au & Human Rights at Coles, N/A: colesgroup.com.au] • Met: Respect H&S of workers: The Company indicates that it is 'committed to providing a safe and healthy environment for our team, customers, suppliers, visitors and supply chain partners'. It has a system that 'helps to promote and provide a safe and healthy work environment as well as early and effective injury management assistance to team members injured as a result of work'. [Health, Safety and Wellbeing Policy: colesgroup.com.au]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> Met: H&S applies to AG suppliers: The 'Ethical sourcing policy' contains different requirements regarding health and safety, including the following: 'suppliers will provide workers with a safe and clean working environment taking into consideration the prevailing knowledge of the industry and of any specific hazards'. The Company discloses additional safe working conditions requirements. [Ethical Sourcing Policy, 03/2020: colesgroup.com.au & Ethical sourcing supplier requirements, 06/2020: colesgroup.com.au]
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: Particularly with suppliers and its workers: 'in 2020 we worked with the United Workers Union to host a farm worker education session in a key Australian produce growing region. It involved direct engagement with workers and covered worker rights and freedom of association. We are committed to meeting directly with workers so that they have opportunity to share their experience with us and we have opportunity to strengthen our program based on their experiences'. It also indicates that since 2017, when it was formed the 'Coles Agronomy Group with 20 growers', they have 'worked with us and volunteered time to address industry challenges around labour practices in the fresh produce industry, varietal development, sustainable farm practices and water use'. [Human Rights at Coles, N/A: colesgroup.com.au] <p>Score 2</p> <ul style="list-style-type: none"> Met: Regular stakeholder design engagement: In 2018 Westfarmers Modern Slavery Statement (which includes Coles activities in fiscal year 2017/2018), it is being said: 'Our businesses regularly engage with workers in tier-one factories in our supply chain through factory visits (both announced and unannounced), our audit program and our grievance mechanisms. Through these engagements, we seek feedback on how well the policies and procedures outlined in Table 2 work in practice. For example: Coles' Agronomy Group was active during the year, with approximately 20 growers volunteering their time to work together with Coles to address industry challenges around varietal development, sustainable farm practices, water use and labour practices in the fresh produce industry'. No more recent evidence found on how this engagement is used for monitoring or designing purposes. Existing evidence is still on date. [2018 Modern Slavery Statement, Sep 2018: sustainability.westfarmers.com.au & Human Rights at Coles, N/A: colesgroup.com.au]
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: The Company states 'Coles is committed to address, prevent and provide remedy to adverse human rights impacts that Coles has caused or contributed to'. [Ethical Sourcing Remediation Framework, 06/2020: colesgroup.com.au] <p>Score 2</p> <ul style="list-style-type: none"> Met: Not obstructing access to other remedies: The Company states 'We commit to not obstructing access to other remedies, including judicial or non-judicial remedies. We also support the work of and are open to working with the Australian National Contact Point'. [Human Rights at Coles, N/A: colesgroup.com.au & Ethical Sourcing Remediation Framework, 06/2020: colesgroup.com.au] Met: Collaborating with other remedy initiatives: See above. [Ethical Sourcing Remediation Framework, 06/2020: colesgroup.com.au] Met: Work with AG suppliers to remedy impacts: The Company states that 'Coles has mechanisms in place [...] to identify adverse human rights impacts and remediate harm where possible. This includes working with our suppliers when they have caused harm'. The Company has a specific document in the context of ethical sourcing for remediation framework, including processes and channels in a supplier collaboration context. The Company has developed different Remediation Programs related with: Wages and Benefits, Child Labour and Forced and Bonded Labour. [Ethical Sourcing Policy, Supplier Requirements and Tools, Feb 2019: colesgroup.com.au & Ethical Sourcing Remediation Framework, 06/2020: colesgroup.com.au]

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: See indicator A.1.2. The Company is signatory to the UN Global Compact. • Met: Senior responsibility for HR: 'Governance of human rights and implementation of our Strategy is overseen by a Human Rights Steering Committee, chaired by our Chief Legal and Safety Officer. This Committee, which meets regularly, consists of representatives with responsibility for implementing our Human Rights Strategy from across the Coles Group. These representatives include members from our ethical sourcing, procurement, legal, corporate affairs, merchandise and operations teams'. [Human Rights at Coles, N/A: colesgroup.com.au] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Day-to-day responsibility: 'The Ethical Sourcing Team is responsible for administration of the Ethical Sourcing Program and works in partnership with functional business units to execute actions [...] procurement teams and product technologists have the direct relationship with our suppliers and are responsible for the day-to-day execution of the Ethical Sourcing Program. Functional teams are regularly updated on the status of the Ethical Sourcing Program and human rights commitments. Performance information is also included in training aimed at ensuring the team understand their ethical sourcing and human rights responsibilities and the impact of their actions'. However, it is not clear which are the resources to manage human-rights related issues within own operations, as the Human Rights Working Group seems to refer to senior management oversight. [Human Rights at Coles, N/A: colesgroup.com.au] • Met: Day-to-day responsibility for AG in supply chain: Also on its website section 'Ethical Sourcing': 'Day to day management of human rights in the supply chain is overseen by the Ethical Sourcing team which is responsible for identifying human rights risks, conducting and reviewing supplier audits, remediation of non-conformances through corrective action plans and tailored processes, as well as building capacity throughout the supply base and training suppliers and team members on human rights risks and practical mitigation strategies.' [Ethical Sourcing - Human Rights, Jul 2019: colesgroup.com.au & Ethical Sourcing Policy, 03/2020: colesgroup.com.au]
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 indicates that it has developed a strategy 'with the support from independent human rights experts. It followed a review of business and stakeholder needs, a review of existing policies as well as team member interviews and group workshops'. As part of strategy development it identified six categories of human rights risks [...] These risks will be reviewed and updated periodically in consultation with stakeholders, including team members, suppliers, supply chain workers, customers, community and key stakeholders'. [Human Rights at Coles, N/A: colesgroup.com.au & Human Rights strategy, N/A: colesgroup.com.au] • Met: Identifying risks in AG suppliers: See above. Strategy and risks identified refer significantly to supply chain operations. [Human Rights at Coles, N/A: colesgroup.com.au & Ethical Sourcing Program Supplier Guidance, 07/2020: colesgroup.com.au] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Ongoing global risk identification: The Company states that, following the strategy development, that was published in 2020 and included a risk identification, 'these risks will be reviewed and updated periodically in consultation with stakeholders including team members, suppliers, supply chain workers, customers, community and key stakeholders'. [Human Rights at Coles, N/A: colesgroup.com.au] • Not met: In consultation with stakeholders: The Company indicates that the human rights strategy 'followed a review of business and stakeholder needs, a review of existing policies as well as team member interview and group workshops'. However, it is not clear if stakeholders (affected) were consulted in the risk identification process. [Human Rights at Coles, N/A: colesgroup.com.au]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not met: In consultation with HR experts: The Company indicates that 'the [human rights] strategy was developed with support from independent human rights experts'. However, no further details found. The Company uses different platforms for supplier risk identification. However, it is not clear which experts were consulted as part of the identification process or what specific work they carried out. [Human Rights at Coles, N/A: colesgroup.com.au & Ethical Sourcing Program Supplier Guidance, 07/2020: colesgroup.com.au] • Not met: Triggered by new circumstances: The Company reports in relation to the COVID-19 situation, and how in this context it met with United Workers union, who 'outlined specific concerns and issues they were experiencing as a result of COVID-19'. The Company then describes that it took in response to that. However, this looks for a systematic approach to how new circumstances can trigger the risk identification process. This seems a specific action in a crisis event context. [Human Rights at Coles, N/A: colesgroup.com.au] • Not met: Explains use of HRIAs or ESIA (inc HR)
B.2.2	Assessing: Assessment of risks and impacts identified (salient risks and key industry risks)	1	<p>The individual elements of the assessment are met or not as follows: Score 1</p> <ul style="list-style-type: none"> • Not met: Salient risk assessment (and context): The Company indicates that its strategy was developed 'following a review of business and stakeholder needs, a review of existing policies as well as a team member interviews and group workshops'. However, it is not clear the specific steps taken to determine risk saliency, including how relevant factors were taken into account, such as social, geographical, economic, or others. In addition, the Company also discloses its ethical sourcing program guidance, where the Company explains its risk management process for suppliers. It includes supplier segmentation including inherent exposure (risk to people or the likelihood of an adverse labour/human rights risk violation occurring within a given suppliers' operations depending on country and category/product), leverage of the Company, pre-defined risk assessment and management framework for each 'in scope' supplier, and use of external resources such as 'Sedex', 'Fair Farms' and 'Ariba'. However, this evidence seems to refer to how the level of risk of each specific supplier is determined and the supplier risk management system. This indicator looks for evidence of how the Company has assessed which are the risks to which it is exposed (own operations and/or supply chain) and are considered salient, as per the list below, not which specific supplier risk level is. [Human Rights at Coles, N/A: colesgroup.com.au & Ethical Sourcing Program Guidance, 07/2020: colesgroup.com.au] • Met: Public disclosure of salient risks: The Company, in regards to their Human Rights Strategy, states 'As part of the strategy development, we identified and categorised our key (salient) human rights risks under six themes: Labour rights; Right to health and safety; Right to equality and freedom from discrimination; Indigenous rights; Cultural rights; Right to dignity and justice'. 'These risks will be reviewed and updated periodically in consultation with stakeholders including team members, suppliers, supply chain workers, customers, community and key stakeholders'. Although it refers to 'areas' of risks and it is not clear which are the total specific risks it faces, particularly under the heading 'labour rights', it is explicit about some of them. [Human Rights at Coles, N/A: colesgroup.com.au] <p>Score 2</p> <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	1	<p>The individual elements of the assessment are met or not as follows: Score 1</p> <ul style="list-style-type: none"> • Not met: Action Plans to mitigate risks: The Company describes in its human rights strategy document a figure indicating what is the 'path to achieving our human rights commitments'. Which includes a set of actions within different categories. However, although this roadmap collects a set of actions, it is not clear which are being implemented or how, to mitigate the different human rights and impacts it faces. [Human Rights strategy, N/A: colesgroup.com.au & Human Rights at Coles, N/A: colesgroup.com.au]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not met: Including in AG supply chain: The Company describes its remediation framework, and also how its ethical sourcing programme is operated, following the risk assessment of individual suppliers. It includes questionnaires, audits and remediation. However this seems to refer to compliance monitoring and remediation following non-compliances. This indicator looks for a risk-mitigation perspective. Following the assessment of the salient risks that the company faces in different areas (regions, products, groups of suppliers, etc), which proactive actions carries out to mitigate the different risks. Although supplier monitoring is part of risk management, it is not clear how the system targeting risks operates (i.e capacity building in specific topics considered salient, or systematic work like the example described below). [Ethical Sourcing Program Guidance, 07/2020: colesgroup.com.au & Human Rights at Coles, N/A: colesgroup.com.au] • Met: Example of Actions decided: On its website, the Company indicates: 'third-party labour hire organisations provide an essential service to Coles' suppliers, however they can also introduce human rights and workplace compliance risks into these supply chains. In Australia, state-based labour hire licensing schemes, as well as independent programs such as Staffsure, can assist suppliers to minimise their recruitment and staffing industry risk. StaffSure is an independent industry-led certification program that assesses labour hire providers against six key risk elements: 1. Fit and proper persons own and run the labour hire business; 2. Fair remuneration to ensure workers receive legal employment entitlements; 3. Financial assurance to operate the labour hire business sustainably; 4. Safe work for all workers; 5. Immigration and visa laws are complied with; and 6. Accommodation supplied by employers or clients is suitable and rent is fair. Suppliers can find StaffSure certified labour providers through an online registry. In addition to supporting the development of the StaffSure program, Coles has developed a Third-party Labour Provider Guidance for our suppliers. This tool is available for all Coles' suppliers and outlines practical advice for managing labour hire, including detailing what good and best practice looks like to support suppliers on their continuous improvement journey'. [Human Rights at Coles, N/A: colesgroup.com.au] <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 describes its governance structure for managing human rights strategy, In addition, it discloses its remedy mechanisms and complaints raised against suppliers. However, this indicator looks for a system to track from a risk perspective, whether actions carried out to mitigate different salient issues (see B.2.2) are being effective or are not achieving the desired results. [Human Rights at Coles, N/A: colesgroup.com.au & Human Rights strategy, N/A: colesgroup.com.au] • Not met: Lessons learnt from checking effectiveness: The Company states 'Prior to insourcing the majority of our trolley collection, we contracted external providers to undertake this work. An investigation by the Fair Work Ombudsman in 2011 found that some sub-contractors had underpaid workers performing trolley collection for Coles. As a result of the investigation we agreed to establish a hotline for subcontractors to speak with us directly about their concerns, to establish a fund to correctly pay subcontractors and to directly employ trolley collectors in future. We continue to incorporate the learnings from this undertaking and work with suppliers to adapt our purchasing practices and enable us to better identify labour risks within our supply chain'. However, this indicator looks for specific lessons learnt after this action plan was implemented. Current evidence found only indicates that it incorporates them. [Human Rights at Coles, N/A: colesgroup.com.au & Third party website - FairWork, N/A: fairwork.gov.au] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirement under score 1 met
B.2.5	Communicating : Accounting for how human rights impacts are addressed	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Comms plan re identifying risks: See indicator B.2.1. The Company carries out a global risk identification and assessment process that includes both its own operations and business partners, and describes at least some features of the process. • Not met: Comms plan re assessing risks: In order to be awarded this indicator, the Company has to achieve a full score in B.2.2 • Not met: Comms plan re action plans for risks: In order to be awarded this indicator, the Company has to achieve a full score in B.2.3 • Not met: Comms plan re reviewing action plans: In order to be awarded this indicator, the Company has to achieve a full score in B.2.4

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Met: Including AG suppliers: In order to be awarded this indicator, the Company has to achieve a full score in B.2.2/B.2.3/B.2.4 and at least 1,5 points in B.2.1 Score 2 • Met: Responding to affected stakeholders concerns: The Company discloses in its know the chain response how it responded to a specific concern raised: 'On 10 November 2016 Coles became aware of the Sydney Morning Herald's investigation into this supplier. We commenced our own review into the supplier's operations which were shared with the Fair Work Ombudsman. The supplier had not been part of any previous investigation by Coles and the alleged practices first came to our attention direct from the media. We reviewed Visa Entitlement Verification Online (VEVO), the supplier's labour hire contracting details, its pay rates and piece rates and accommodation. We took immediate steps to have the supplier register on Sedex. We requested the supplier undertake a cultural assessment of their subcontracting practices, which they did, and offered to provide support and appropriate training to ensure that the supplier's hiring guidelines are transparent and legal. The supplier's site was registered onto Sedex. An independent ethical audit of the site was scheduled and conducted in December 2016 where one minor nonconformance in respect of health and safety was identified and closed out by the supplier. To date and since the allegations Coles has record of four independent ethical audits of this site. Coles is satisfied with the supplier's compliance with our Ethical Sourcing Program since the allegations'. [Know the Chain response 2020, 2020: media.business-humanrights.org] • 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	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Channel accessible to all workers: The Whistleblowing Policy indicates: 'Coles has both informal and formal ways in which concerns can be raised depending on your circumstances and the level of seriousness of the issue.[...] You may report a matter directly to any of the following Coles Protected Disclosure Officers: [...] You can report a matter to Stopline by calling or emailing. Stopline is an independent and confidential reporting line that is run by an independent company. Team members, suppliers, contractors, suppliers, employees of contractors and anyone covered by this Policy may use Stopline to report Potential Misconduct. The Company considers potential misconduct, among other issues, the breach of 'Coles Code of Conduct or other policies or procedures'. [Whistleblowing Policy, Jun 2019: colesgroup.com.au & STOPline website: stopline.com.au] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Number grievances filed, addressed or resolved: The Company provides a list of complaints and grievances raised against suppliers. However, it is not clear if these are the total number of grievances received in relation to human/labour rights [Human Rights Complaints Raised Against Coles Suppliers, 2020: colesgroup.com.au] • Met: Channel is available in all appropriate languages: The Company has provided comments to CHRB regarding this indicator. 'Coles is an Australian based company where all of our stores and offices are in Australia - except for our recently opened Shanghai office. We therefore do not consider we need to make our complaints channel for our own operations available in languages other than English.' The Company instead refers to STOPline, 'a confidential telephone service run by an independent third party that all stakeholders can use to raise concerns or make complaints. It can be accessed overseas and in multiple languages, with translation available on request through an Australian Government translation service and language setting within the Mobile App' [Ethical Sourcing - Human Rights, Jul 2019: colesgroup.com.au & STOPline website: stopline.com.au] • Met: Opens own system to AG supplier workers: The Company indicates that in 2015 it established 'the confidential Coles' Wages and Conditions Hotline for workers in our supply chain including farms, factories and service providers'. It provides a telephone number in Australia, and an email address for workers for whom English is not a first language. It also indicates that 'posters promoting the Coles Wages and Conditions Hotline services are available in three different languages. They have been sent to all Coles Own Brand fresh produce and meat processing sites for display in tea rooms and communal areas'. [Poster - Hotline, Jul 2019: colesgroup.com.au & Ethical Sourcing - Human Rights, Jul 2019: colesgroup.com.au]

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	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 Whistleblowing Policy indicates: 'You can report a matter to Stopleveline by calling or emailing. Stopleveline is an independent and confidential reporting line that is run by an independent company. Team members, suppliers, contractors, suppliers, employees of contractors and anyone covered by this Policy may use Stopleveline to report Potential Misconduct.' Potential misconduct includes breaches of the code of conduct or other policies and procedures, conducts that 'may cause financial loss to Coles or damage its reputation or be otherwise detrimental to Coles interests; or concerns any other kind of serious misconduct or an improper state of affairs or circumstances'. The stopline website also describes that allows complaints from workers and other stakeholders. [Whistleblowing Policy, Jun 2019: colesgroup.com.au & STOPline website: stopline.com.au] <p>Score 2</p> <ul style="list-style-type: none"> Not met: Describes accessibility and local languages: The Company states 'For workers in the international supply chain and those where English is not a first language, we have an email facility at wageline@coles.com.au where workers can provide their telephone number, preferred language and a brief description of their concern so that any issues can be addressed by Coles or the relevant authority.' However, no evidence was found on this system being open for external stakeholders. [Coles Wages and Conditions Hotline, N/A: colesgroup.com.au] Met: Expects AG supplier to have community grievance systems: The Company states 'Suppliers are to provide appropriate channels for worker and community grievances, and these channels are to be effectively communicated (for example, in spoken languages, in physical and electronic forms). These channels will be communicated in addition to building capacity and awareness around social and labour practices. This effectiveness of these channels will be assessed using stakeholder feedback.' The ethical sourcing policy states that 'we expect our direct suppliers to ensure our Policy and Requirements are cascaded to their own suppliers and monitor their performance'. [Ethical Sourcing Program Guidance, 07/2020: colesgroup.com.au & Ethical Sourcing Policy, 03/2020: colesgroup.com.au]
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: Says how it would remedy key sector risks: The Company has developed different Remediation Programs related with: Wages and Benefits, Child Labour and Forced and Bonded Labour. In its Ethical Sourcing - Supplier Requirements it describes the Remediation Steps that the supplier must take to remedy their non-compliance in order to keep working with the Company. For instance, the Remediation Steps related with Wages and Benefits include the following: '[...] The employer should communicate to the workers that the underpayment has taken place and workers will receive appropriate back-payment. This document should be made available for auditor review. 5.4. The employer should pay the owed amount to the affected workers within a reasonable time period, to be agreed with Coles. [...] 5.7. If in Coles' view the supplier does not take the appropriate steps to remedy the underpayment of wages and benefits within a reasonable time, supply to Coles will be immediately suspended, and Coles may terminate the supply agreement and notify the Fair Work Ombudsman.' [Ethical Sourcing - Policy, Supplier Requirements and Tools, Feb 2019: colesgroup.com.au] <p>Score 2</p> <ul style="list-style-type: none"> Met: Changes introduced to stop repetition: The Company states 'Prior to insourcing the majority of our trolley collection, we contracted external providers to undertake this work. An investigation by the Fair Work Ombudsman in 2011 found that some sub-contractors had underpaid workers performing trolley collection for Coles. As a result of the investigation we agreed to establish a hotline for subcontractors to speak with us directly about their concerns, to establish a fund to correctly pay subcontractors and to directly employ trolley collectors in future.' [Ethical Sourcing - Human Rights, Jul 2019: colesgroup.com.au] Not met: Evaluation of the channel/mechanism: The Company states 'Coles Group Board and Executive Leadership Team receive regular updates on the status of our Human Rights Strategy including our Ethical Sourcing Program'. As part of the Company's Ethical Sourcing Program, the effectiveness of the Remediation Framework is evaluated through these updates. However, no evidence was found on an evaluation of the effectiveness of the grievance mechanisms. [Human Rights at Coles, N/A: colesgroup.com.au]

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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