

# Corporate Human Rights Benchmark 2020 Company Scoresheet



Company Name Columbia Sportswear
Industry Apparel (Supply Chain only)

**UNGP Core Score (\*)** 4.5 out of 26

Embedding respect

Score	Out of	For indicators
Governance ar	nd Policy Comr	mitments
1	2	A.1.1 Commitment to respect human rights
0.5	2	A.1.2 Commitment to respect the human rights of workers
0	2	A.1.4 Commitment to engage with stakeholders
0	2	A.1.5 Commitment to remedy

### **Embedding respect and Human Rights Due Diligence**

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0.5	2	B.1.1 Embedding - Responsibility and resources for day-to-da human rights functions		
Humana Dial	hta Dua Diliaan			
Human Rigi	hts Due Diliger	ice (HKDD)		
0	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)		
0	2	B.2.3 HRDD - Integrating and Acting: Integrating assessment		
		findings internally and taking appropriate action		
0	2	B.2.4 HRDD - Tracking: Monitoring and evaluating the		
		effectiveness of actions to respond to human rights risks and		
		impacts		
		•		
0	2	B.2.5 HRDD - Reporting: Accounting for how human rights impacts		
		are addressed		

### **Remedies and Grievance Mechanisms**

1.5	2	C.1 Grievance channels/mechanisms to receive complaints or concerns from workers
0	2	C.2 Grievance channels/mechanisms to receive complaints or concerns from external individuals and communities
0	2	C.7 Remedying adverse impacts and incorporating lessons learned
4.5	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	1	The individual elements of the assessment are met or not as follows:  Score 1  • Met: General HRs commitment: The Company states in its Code of Business  Conduct: 'We respect and protect human rights and we are committed to decent and humane working conditions. We do not tolerate any conduct that contributes to, encourages or facilitates human trafficking, child labor, forced or compulsory labor, or any other human rights abuses. This is true not only for our own workforce, but also for the employees of the manufacturers we contract with around the world'. [Code of Business Conduct and Ethics, 07/2018: dlio3yog0oux5.cloudfront.net] Score 2  • Not met: UNGPs: The Company states in its 'Transparency in Supply Chain Statement' that it 'complies with the UN Guiding Principles on Business and Human Rights (UNGPs), which specify that due diligence processes should 'include assessing actual and potential human rights impacts, integrating and acting upon the findings, tracking responses and communication how impacts are addressed'. However, the commitment to the UNGPs is not clear. [Transparency in Supply Chain 2018, 2019: cscworkday.blob.core.windows.net]  • Not met: OECD
A.1.2	Commitment to respect the human rights of workers	0.5	The individual elements of the assessment are met or not as follows:  Score 1  Not met: ILO Core: In its Code of Business Conduct the Company states: 'We respect and protect human rights and we are committed to decent and humane working conditions. We do not tolerate any conduct that contributes to, encourages or facilitates human trafficking, child labor, forced or compulsory labor, or any other human rights abuses. This is true not only for our own workforce, but also for the employees of the manufacturers we contract with around the world, as further described in the Corporate Responsibility section of our Company website.'  [] 'we do not tolerate discrimination or harassment on the basis of any of these categories.' However, there is no mention to all ILO core (free association and collective bargaining is missing) and the commitment to respect each one of these rights is not clear enough. [Code of Business Conduct and Ethics, 07/2018:  dlio3yog0oux5.cloudfront.net]  Not met: UNGC principles 3-6  Met: Explicitly list ALL four ILO for AP suppliers: Its 'Standards of Manufacturing Practices', addressed to third-party manufacturing facilities, includes: prohibition to use Forced Labor or Child Labor, Non-discrimination, respect freedom of association and bargain collectively. With respect the last two, the document says: 'Supplier must recognize and respect the right of employees to associate, organize and bargain collectively. Where the right of freedom of association and collective bargaining is restricted under law, the supplier allows the development of parallel means for independent and free association and bargaining.' [Standards of Manufacturing Practices, 2018]  Score 2  Not met: Explicit commitment to All four ILO Core: See above [Code of Business Conduct and Ethics, 07/2018: dlio3yog0oux5.cloudfront.net]  Met: Respect H&S of workers: The Company also commits to maintaining a safe work environment, setting health and safety rules, regulations and policies. [Code of Business Conduct and Ethics of Wi

Indicator Code	Indicator name	Score (out of 2)	Explanation
			health & safety standards regarding working conditions, including any housing and cafeteria requirements.' [Standards of Manufacturing Practices, 2018]  Not met: working hours for workers  Not met: Working hours for AP suppliers: Its 'Standards of Manufacturing
			Practices' indicates: 'Supplier must not require workers to work more than the regular and overtime hours allowed by the law of the country where the workers
			are employed. The regular work week shall not exceed 48 hours; other than in
			exceptional circumstances, the sum of regular and overtime hours in a week shall not exceed 60 hours.' Also, 'supplier must allow workers at least 24 consecutive
			hours of rest in every seven-day period'. However, the Company opens the
			possibility to exceed the 60 hours limit in exceptional circumstances. [Standards of Manufacturing Practices, 2018]
A.1.4	Commitment to		The individual elements of the assessment are met or not as follows:
	engage with		Score 1
	stakeholders		Not met: Commits to stakeholder engagement: In its website the Company
			indicates: 'We recognize that we are a single player in a large, complex, global
			supply chain. To impact meaningful change, we need to work with brand, industry, and multi-stakeholder players []. However, there is no commitment to engage
			with its potentially and actually affected stakeholders. [Responsible Practices, N/A:
			columbia.com]
			• Not met: Regular stakeholder engagement: The Company indicates in its website
			that it works with different organizations in order to: 'Align on common standards
			for evaluating social and environmental impacts in our business and our supply chain. Standardization will enable greater efficiency in evaluation methods and
			comparability of results; Develop shared tools to reduce costs and improve
			methods for implementing social and environmental programs; Share resources
		0	with industry partners on specific projects, such as audit and capacity building, to
			reduce audit fatigue and increase collective impact.' The Company selects these
			organizations based on their 'ability to influence systemic change and their
			relevance to our business and supply chain.' Among the selected organizations we can find: Outdoor Industry Association Sustainability Working Group, Sustainable
			Apparel Coalition, Fair Labor Association, UN International Labor Organization,
			Business for Social Responsibility-s HERproject, American Apparel & Footwear
			Association and Footwear Distributors and Retailers of America. However, there is
			no evidence of this engagement in the last 2 years and there are some groups
			which are not represented in the organizations mentioned (local communities,
			trade unions). [Responsible Practices, N/A: <u>columbia.com</u> ] Score 2
			Not met: Commits to engage stakeholders in design
			Not met: Regular stakeholder design engagement
A.1.5	Commitment to		The individual elements of the assessment are met or not as follows:
	remedy		Score 1
			Not met: Commits to remedy: On its website section 'Responsible Practices' the Company indicates that: 'Columbia employs a team of Corporate Responsibility
			Specialists who conduct regular audits of our suppliers against our SMP. All of our
			audits are conducted on an unannounced basis, allowing our Specialists to see the
			factory conditions as they are on a typical day. We work with the factories to
		_	develop a Corrective Action Plan to remediate issues identified during the audit. As
		0	we consider our suppliers as partners, our approach to remediation is continuous
			improvement, working together to improve working conditions.' However, no specific commitment to remedy the adverse impact on individual, workers and
			communities that it has caused or contributed to was found. [Responsible Practices
			/ Elevating Responsibility, N/A: columbiasportswearcompany.com]
			Score 2
			Not met: Not obstructing access to other remedies
			Not met: Collaborating with other remedy initiatives     Not met: World with A.P. supplies to general impossible.
	j		Not met: Work with AP suppliers to remedy impacts

### **Embedding Respect and Human Rights Due Diligence**

Indicator Code	Indicator name	Score (out of 2)	Explanation
	Responsibility and resources for day-to-day human rights functions	0.5	The individual elements of the assessment are met or not as follows:  Score 1  Not met: Commits to ILO core conventions: See indicator A.1.2

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul> <li>Met: Senior responsibility for HR: In its 'Corporate Responsibility Report', the Company indicates: 'Our Corporate Responsibility team consists of 32 people located around the world, from our corporate headquarters in Portland, Oregon to prAna headquarters in Carlsbad, California to the regions where we manufacture our products. The Vice President of Corporate Responsibility, Abel Navarrete, reports to the Executive Vice President, Chief Administrative Officer and General Counsel, Peter Bragdon.' [Corporate Responsibility Report 2018, 2018: cscworkday.blob.core.windows.net]</li> <li>Score 2</li> <li>Met: Day-to-day responsibility: See description above in relation to Corporate Responsibility team. In its 'Corporate Responsibility Report', the Company indicates: 'Columbia Sportswear Company (CSC) employs a team of Corporate Responsibility Specialists who conduct regular audits and assessments of our suppliers against our SMP. The majority of audits are conducted on an unannounced basis, allowing our specialists to see the factory conditions as they are on a typical day.' In addition, the Company discloses that its Standards of Manufacturing Practices (SMP), also known as our Code of Conduct, outlines our expectations of our suppliers. [Corporate Responsibility Report 2018, 2018: cscworkday.blob.core.windows.net]</li> <li>Met: Day-to-day responsibility for AP in supply chain: See above. In addition, in its 'Transparency in Supply Chain Statement' document, the Company indicates: '[] we maintained nine manufacturing liaison offices are direct employees of CSC and are responsible for overseeing production at our contract manufacturers. [] to monitor factories for compliance with our policies, procedures and standards</li> </ul>
			related to labor practices'. [Transparency in supply chain 2018, 2018: ttps://prana.com]
B.2.1	Identifying: Processes and triggers for identifying human rights risks and impacts	0	The individual elements of the assessment are met or not as follows:  Score 1  Not met: Identifying risks in own operations  Not met: Identifying risks in AP suppliers  Score 2  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)	1	The individual elements of the assessment are met or not as follows:  Score 1  • Met: Salient risk assessment (and context): In its 'Transparency in Supply Chain Statement' document the Company indicates: 'CSC assesses the risks related to our apparel, footwear, accessories, and equipment supply chains at the country, vendor and factory levels. Risk assessment is performed internally by our sourcing, legal and corporate responsibility teams on a regular basis. We recognize our industry's supply chain has a risk of human trafficking in the form of foreign migrant workers. To confirm our commitment and accountability to address this issue, in October 2018 we signed on to the American Apparel and Footwear Association (AAFA) & Fair Labor Association (FLA)'. The Company also states in its Sustainability Report: 'We are committed to performing due diligence within our operations to eradicate the risk of modern slavery and human trafficking in our supply chain. We publish a Transparency in Supply Chain Statement on the Corporate CSC website as well as on the home page of all of our brands' websites, which outlines our efforts to address the issues of slavery and human trafficking in our supply chain to meet the California Transparency in Supply Chains Act of 2010 (SB 657) and the United Kingdom Modern Slavery Act of 2015.' [Transparency in supply chain 2019, 2019: cscworkday.blob.core.windows.net]  • Not met: Public disclosure of salient risks Score 2  • 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  Not met: Action Plans to mitigate risks: In its 'Transparency in Supply Chain Statement' document the Company indicates: 'We recognize our industry has a risk of human trafficking in the form of foreign migrant workers'. However, no evidence found regarding the system put in place to take action to prevent, mitigate or remediate its salient human rights issues. [Transparency in supply chain 2019, 2019: <a href="mailto:cscworkday.blob.core.windows.net">cscworkday.blob.core.windows.net</a> ]  Not met: Including in AP supply chain: As stated above, there are no further details against a system to prevent, mitigate or remediate its salient human rights issues.  Not met: Example of Actions decided Score 2  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  Not met: System to check if Actions are effective  Not met: Lessons learnt from checking effectiveness  Score 2  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  Not met: Comms plan re identifying risks: See indicator B.2.1  Not met: Comms plan re assessing risks: See indicator B.2.2  Not met: Comms plan re action plans for risks: See indicator B.2.3  Not met: Comms plan re reviewing action plans: See indicator B.2.4  Not met: Including AP suppliers  Score 2  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)/mec hanism(s) to receive complaints or concerns from workers	1.5	The individual elements of the assessment are met or not as follows:  Score 1  • Met: Channel accessible to all workers: In its Code of Business Conduct, the Company refers to different channels to raise a complaint or concern or to report any violation of the Code. One of this channels is the Compliance Line which 'offers two easy options for you to report ethics and compliance concerns via phone or online'. [Code of Business Conduct and Ethics, 07/2018:  d1io3yog0oux5.cloudfront.net]  Score 2  • Not met: Number grievances filed, addressed or resolved  • Met: Channel is available in all appropriate languages: In addition, it indicates: 'If you would like to make a report in your local language, we encourage you to use the toll-free phone option to ensure our Ethics & Compliance team receives as accurate a translation as possible. Our reporting solution also offers the option to display the report form in your preferred language' (there are more than 55 languages available in the Compliance Line website) [Code of Business Conduct and Ethics, 07/2018: d1io3yog0oux5.cloudfront.net]  • Not met: Expect AP supplier to have equivalent grievance systems  • Met: Opens own system to AP supplier workers: In its Standards of Manufacturing Practices the Company indicates: 'To report a violation of these Standards, please contact: SMP@Columbia.com'. [Standards of Manufacturing Practices, 2018]
C.2	Grievance channel(s)/mec hanism(s) to receive complaints or concerns from external	0	The individual elements of the assessment are met or not as follows:  Score 1  Not met: Grievance mechanism for community  Score 2  Not met: Describes accessibility and local languages  Not met: Expects AP supplier to have community grievance systems  Not met: AP supplier communities use global system

Indicator Code	Indicator name	Score (out of 2)	Explanation
	individuals and communities		
C.7	Remedying adverse impacts and incorporating lessons learned	0	The individual elements of the assessment are met or not as follows:  Score 1  Not met: Describes how remedy has been provided  Not met: Says how it would remedy key sector risks  Score 2  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		Headline: Report finds female migrant workers are subjected to conditions of modern slavery in factories supplying to many brands     Area: Forced labour - restriction of movement     Story: On February 28, 2018, the Business & Human Rights Resource Centre website reported that according to a study conducted by the India Committee of the Netherlands, Clean Clothes Campaign and Garment Labour Union, that looks into the living conditions in Bangalore garment factory hostels and the particular challenges migrant workers face. It is found that five out of the eleven ILO (International Labour Organization) indicators for forced labour exists in the Bangalore garment industry: abuse of vulnerability, deception as a result of false promises (wages etc.), restriction of movement in the hostel, intimidation and threats, and abusive working and living conditions. The report identifies two companies, Company 1 & Company 3 as supplying a number of major fashion brands, including Columbia Sportswear. Connected to these Companies are 'hostels', living quarters for workers located nearby the factory they work at. Women who lived at these hostels complained that their movement was restricted by the factory employees and hostel authorities. At Company 1 the women were escorted from the factory back to the hostel in the afternoon and were banned from leaving the hostel during weekday evenings. On Sunday's they were allowed to leave the hostel unnaccompanied, however this was only between the hours of 4pm to 7pm. At Company 3, women were only allowed to leave the hostel for a total of 3 hours on Sunday, between 12pm and 7pm, on all other days they had to be back inside the hostel by 7pm. Additionally, hostel authorities would not allow the families of the women to enter the hostel when they came to visit, and the use of mobile phones was only permitted between 8.30pm - 9.30pm at night. While some of these aspects are also felt by the local workforce, they are more strongly experienced by migrant workers. According to the rep
E(1).1	The Company has responded publicly to the allegation	2	The individual elements of the assessment are met or not as follows:  Score 1  • Met: Public response available: The company provides a response on the BHRRC website where it acknowledges the allegations and also outlines the steps taken to address the issues raised through amendments to policies and procedures.  [Company's response to allegation of forced labour: media.business-humanrights.org]  Score 2  • Met: Response goes into detail: The company responds in detail, outlining specific changes it has made to its policies and also auditing procedures.  [Company's response to allegation of forced labour: media.business-humanrights.org]
E(1).2	The Company has appropriate policies in place	1	The individual elements of the assessment are met or not as follows:  Score 1  • Met: Company policies address the general issues raised: The company says "We respect and protect human rights and we are committed to decent and humane working conditions. We do not tolerate any conduct that contributes to, encourages or facilitates human trafficking, child labor, forced or compulsory labor, or any other human rights abuses. This is true not only for our own workforce, but also for the employees of the manufacturers we contract with around the world" [Code of Business Conduct and Ethics, 04/2018: investor.columbia.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			Met: Policies apply to the type of business relationships involved: The company says in its 'Standards of Manufacturing Practices', "Whether we (or our subsidiaries, divisions, affiliates or agents) enter into or continue a business relationship with a particular supplier depends in part on its compliance with and commitment to the principles outlined in these Standards. When differences or conflicts in standards arise, the highest standard shall apply." [Standards of Manufacturing Practices, 2018]  Score 2  Not met: Policies address the specific rights in question: The company has policies addressing forced labour issues, however there is nothing in relation to guaranteeing the freedom of movement of employees, which the allegations relate to. [Code of Business Conduct and Ethics, 04/2018: investor.columbia.com]
E(1).3	The Company has taken appropriate action	1.5	The individual elements of the assessment are met or not as follows: Score 1  Not met: Engages with affected stakeholders: The company said in its response, "We have reviewed the report with our factory partners in the Bangalore area will continue to focus on these issues as we work with this group of factories in this region." However, this does not indicate that they engaged with the women who were affected or similar type (women in the same working and living conditions in the same region) [Columbia response to Bangalore allegations, 18/02/2018:  business-humanrights.org]  Met: Encourages linked business to engage affected stakeholders: The company said in its response, "Before and after the publication of this report, Columbia has been actively engaging with a group of other brands sourcing in the Bangalore area to collaborate on resolving the issues that the report outlines. This group of brands has met with Bangalore factories to directly discuss conditions in their owned and operated factories and to address the issue of intra-country migrant workers." [Columbia response to Bangalore allegations, 18/02/2018: business- humanrights.org]  Not met: Provides remedies to affected stakeholders: The company said in its response "Specific suppliers and exact factory locations are not outlined by the authors of this report, therefore it is difficult to completely validate the issues outlined, as well as take remediation actions with our suppliers at specific locations". Since they cannot remedy those women as they cannot locate them, CHRB awards these points. [Columbia response to Bangalore allegations, 18/02/2018: business-humanrights.org]  Met: Has reviewed management systems to prevent recurrence: The company said in its response, "Columbia is amending our Migrant Worker Policy to specifically include intrastate migrants. We have also amended our policy to insure that suppliers who facilitate finding off-site accommodations which are not owned or operated by the supplier have a policy and a due diligence proces
E(2).0	Serious		conditions in the same region) [Columbia response to Bangalore allegations, 18/02/2018: business-humanrights.org]  • Headline: Shahi Exports, a supplier of Columbia Sportswear, accused of unfair
	allegation No 2		<ul> <li>practices</li> <li>Area: FoA&amp;CB</li> <li>Story: In June 2018, Worker Rights Consortium (WRC), a US based labour rights monitoring organisation focused on protecting the rights of workers, reported</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			allegations of violent anti-union activity at a Shahi Exports factory in Bangalore, India. WRC exposed its allegations in a 29 page report which included accusations that the mid-level professionals of Shahi Exports house were behind threats and misbehaviour targeting the workers who were demanding a salary increase. A WRC investigation found that in late March through mid-April 2018, the management of Shahi Exports engaged in a campaign of vicious repression and retaliation against workers exercising their fundamental labour rights. The repression and retaliation included physical beatings; death threats; gender, caste, and religion-based abuse; threats of mass termination; and the expulsion from the factory of 15 worker activists. The violations occurred at Shahi" s Unit 8 factor and were allegedly a deliberate effort by Shahi to repress the organisation of a union at the factory as well as prevent an increase in garment workers' wages, reported WRC. Initially, WRC called on Shahi to fire the managers involved, reinstate the workers and recognise the union. However, when Shahi denied the accusations targeting its managers and refused to fire them, the WRC urged Shahi" s major international client including H&M, Benetton, Abercrombie & Fitch and Columbia Sportswear to press Shahi to fire the managers and apologise to the 15 workers.  • Sources: [WRC Website - 20/6/2018: workersrights.org][The Guardian - 19/07/2018: theguardian.com][Apparel Resources - 25/06/2018: apparelresources.com]
E(2).1	The Company has responded publicly to the allegation	1	The individual elements of the assessment are met or not as follows:  Score 1  • Met: Public response available: Columbia Sportswear acknowledged the allegations of violations of fair labour practices at the Shahi factory. [H&M, Columbia, and others are accused of ignoring disturbing abuses at a large Indian supplier, 25/6/2018: <a href="mailto:qz.com">qz.com</a> ]  Score 2  • Not met: Response goes into detail: The company has not responded to each allegation in detail. [H&M, Columbia, and others are accused of ignoring disturbing abuses at a large Indian supplier, 25/6/2018: <a href="mailto:qz.com">qz.com</a> ]
E(2).2	The Company has appropriate policies in place	0.5	The individual elements of the assessment are met or not as follows:  Score 1  Not met: Company policies address the general issues raised: Columbia  Sportswear does not appear to commit to respect freedom of association and collective bargaining for its own employees. [Code of Business Conduct and Ethics, 04/2018: investor.columbia.com]  Met: Policies apply to the type of business relationships involved: Columbia Sportswear requires its suppliers to "recognize and respect the right of employees to associate, organize and bargain collectively in a lawful and peaceful manner without penalty or interference. Where the right to freedom of association and collective bargaining is restricted under law, the employer shall consider the development of parallel means for independent and free association and bargaining." [Standards of Manufacturing Practices, 2018]  Score 2  Not met: Policies address the specific rights in question
E(2).3	The Company has taken appropriate action	0.5	The individual elements of the assessment are met or not as follows:  Score 1  • Met: Encourages linked business to engage affected stakeholders: In Columbia Sportswear's response to the allegations, it stated the following: "We have insisted that Shahi management take immediate action to address the situation, including: reinstate suspended workers, pay medical expenses of workers, return any personal property of workers, engage in constructive and meaningful engagement with the union, and discipline any employees that are found to have engaged in violence or acts of discrimination. We have also insisted that Shahi formally and publicly reconfirm their commitment to freedom of association and to maintaining a safe and non- discriminatory workplace. We understand that the people who have been accused of violence have been suspended pending investigation. We have required Shahi to undertake these actions immediately and we will monitor progress with weekly meetings. If meaningful and prompt progress is not made toward meeting these requirements, we will take necessary steps, including reducing or ceasing production in the factory." [H&M, Columbia, and others are accused of ignoring disturbing abuses at a large Indian supplier, 25/6/2018:  qz.com]  • Not met: Provides remedies to affected stakeholders: There is no evidence that Columbia Sportswear has provided remedies to affected stakeholders.

Indicator Code	Indicator name	Score (out of 2)	Explanation
			Not met: Has reviewed management systems to prevent recurrence: There is no
			evidence that Columbia Sportswear has reviewed management systems to prevent
			recurrence.
			Score 2
			Not met: Remedies are satisfactory to the victims: There is no evidence that
			Columbia Sportswear has provided remedies to the victims.
			Not met: Has improved systems and engaged affected stakeholders: There is no
			evidence that Columbia Sportswear has improved systems and engaged with
			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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