

Company Name Compass Group
Industry Agricultural Products (Supply Chain only)
UNGP Core Score (*) 16.5 out of 26

Score	Out of	For indicators
Governance and Policy Commitments		
2	2	A.1.1 Commitment to respect human rights
2	2	A.1.2 Commitment to respect the human rights of workers
1	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
2	2	C.2 Grievance channels/mechanisms to receive complaints or concerns from external individuals and communities
0.5	2	C.7 Remedying adverse impacts and incorporating lessons learned
16.5	26	

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

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

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

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

Detailed assessment

Governance and Policies

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1.1	Commitment to respect human rights	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: General HRs commitment: The Company indicates that 'we are committed to supporting the dignity, wellbeing and human rights of all our employees, the communities in which we operate, and those affected by our operations'. Also, 'we believe that everyone is entitled to basic rights and freedoms, whoever they are, and wherever they live'. [2020 Human Rights Policy, 06/2020: compass-group.com] • Met: UNGC principles 1 & 2: The Company indicates that 'Compass remains fully committed to supporting the United Nations Global Compact and upholding its ten principles which are reflected in our Corporate Responsibility commitments, policies and practices'. [CompassGroup UN Global Compact, 04/19: s3-us-west-2.amazonaws.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: UNGPs: The Company indicates that 'We are fully committed to the OECD Guidelines for Multinational Enterprises, the United Nations Guiding Principles on Business and Human Rights'. [2020 Human Rights Policy, 06/2020: compass-group.com] • Met: OECD: See above [2020 Human Rights Policy, 06/2020: compass-group.com]
A.1.2	Commitment to respect the human rights of workers	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: ILO Core: The Company indicates that 'We are fully committed to (...) the core conventions of the International Labour Organization ("ILO") and Ethical Trading Initiative'. [2020 Human Rights Policy, 06/2020: compass-group.com] • Met: UNGC principles 3-6: The Statement of continuing support to the Global Compact is signed by a Board member and states the following: 'Compass Group PLC and its group companies ("Compass") has been a signatory to the United Nations Global Compact (UNGC) since June 2004. We remain fully committed to supporting and upholding its 10 Principles in the areas of human rights, labour, environment and anti-corruption'. [UNGC Communication on progress, 01/2018: https://s3-us-west-2.amazonaws.com/ungc-production/attachments/cop_2018/451121/original/Compass_Group_PLC_UNGC_COP_2018_FINAL.pdf?1515081104#..\.Downloads\Link checker 2019.xlsm#Sheet2!G53] • Met: Explicitly list All four ILO for AG suppliers: The Supply chain Integrity policy statement says: ' We embrace the Ethical Trading Initiative (ETI) Base Code principles, and reflect these within our Code of Business Conduct and Supplier Code. The Base Code principles are: Employment is freely chosen; Freedom of association and the right to collective bargaining is respected; Working conditions are safe and hygienic; Child labour shall not be used; Living wages are paid; Working hours are not excessive; No discrimination is practised; Regular employment is provided; No harsh or inhumane treatment is allowed'. [Supply chain integrity policy statement, 01/2018: compass-group.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Explicit commitment to All four ILO Core: The Company states that 'Compass is specifically committed to the four core conventions of the ILO of: the freedom of association, the right to collective bargaining, the elimination of forced or compulsory labour, the abolition of child labour, the elimination of discrimination in respect of employment and occupation'. [2020 Human Rights Policy, 06/2020: compass-group.com] • Met: Respect H&S of workers: The Company commits to respect H&S of its workers in the Workplace Health and Safety Policy Statement. [Health and safety policy statement, 01/2018: compass-group.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> Met: H&S applies to AG suppliers: The Workplace Health and Safety Policy Statement expects 'similarly high standards from our suppliers and contractors'. [Health and safety policy statement, 01/2018: compass-group.com]
A.1.4	Commitment to engage with stakeholders	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Met: Regular stakeholder engagement: The Company reports that 'we conduct regular employee surveys and in 2018 we conducted over 1,000 hours of face to face conversations and 200 hours of focus groups with a broad sample of our employees'. [Campden BRI to support industry authenticity network, 11/07/19: foodnavigator.com & CompassGroup UN Global Compact, 04/19: s3-us-west-2.amazonaws.com] <p>Score 2</p> <ul style="list-style-type: none"> Not met: Commits to engage stakeholders in design Not met: Regular stakeholder design engagement
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 Human Rights Policy states that 'Compass Group is committed to acting with integrity as a responsible business in all our operations globally. This commitment extends to providing access to or cooperating with the remediation of any breaches of human rights we identify we have caused or contributed to in our operations. We aim to achieve this through our Speak Up mechanisms designed to enable effective remedy while not preventing access to other forms of remedy if justified'. [2020 Human Rights Policy, 06/2020: compass-group.com] <p>Score 2</p> <ul style="list-style-type: none"> Met: Not obstructing access to other remedies: As indicated above, the policy states that 'We aim to achieve this through our Speak Up mechanisms designed to enable effective remedy while not preventing access to other forms of remedy if justified'. [2020 Human Rights Policy, 06/2020: compass-group.com] Met: Work with AG suppliers to remedy impacts: The Company indicates that 'Where potential or actual breaches of human rights are identified directly to our activities with our Compass Business Partners, we will support our Business Partners in the remediation of those impacts through their own grievance or Speak Up processes, or support collaboration to provide for non-judicial remediation through third parties'. [2020 Human Rights Policy, 06/2020: compass-group.com]

Embedding Respect and Human Rights Due Diligence

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.1	Responsibility and resources for day-to-day human rights functions	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Met: Commits to ILO core conventions: See indicator A.1.2. The company is committed to support and uphold the UN Global Compact's ten principles. Met: Senior responsibility for HR: The Company states that 'The Group Director of Safety and Sustainability, who reports directly to the Group Chief Executive Officer, acts as the global functional lead for the Group with respect to the human rights policy and has reporting responsibility for human rights across direct operations and within the supply chain'. [Modern Slavery and Human Trafficking Statement 2019, 16/12/19: compass-group.com] <p>Score 2</p> <ul style="list-style-type: none"> Met: Day-to-day responsibility: The Company states that 'The Group Director of Safety and Sustainability, who reports directly to the Group Chief Executive Officer, acts as the global functional lead for the Group with respect to the human rights policy and has reporting responsibility for human rights across direct operations and within the supply chain. The Group Director of Safety and Sustainability is also a member of the Executive Committee and attends all meetings of the Corporate Responsibility Committee. The operational responsibility for execution of our policies sits with our regional and in country managing directors'. Also, multi-national Human Rights Working Group was formed, 'This working group is responsible for overseeing our human rights strategy, including reviewing and updating the human rights policy and implementing initiatives and projects as well as overseeing areas of assessment of human rights across the Group. The Group Head of Ethics and Compliance reports to the Group General Counsel and Company Secretary who is a member of the Executive Committee. The Group Head of Ethics and Compliance attends Corporate Responsibility Committee meetings and has responsibility for overseeing key ethics and compliance risks in the business, and strengthening our policy, controls, reporting and training frameworks'. [Modern Slavery and Human Trafficking Statement 2019, 16/12/19: compass-group.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not met: Day-to-day responsibility for AG in supply chain: The Company indicates that 'The Group Director of Safety and Sustainability (...) has reporting responsibility for human rights across direct operations and within the supply chain'. However, no further details found on how day-to-day responsibility for managing human rights issues within its supply chain is allocated (i.e. team, resources). [Modern Slavery and Human Trafficking Statement 2019, 16/12/19: compass-group.com]
B.2.1	Identifying: Processes and triggers for identifying human rights risks and impacts	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Identifying risks in own operations: The Company indicates that 'during the year, we initiated a Human Rights Risk Assessment across the Group. To help us with the assessment, we engaged the help of independent external human rights specialists who are working in conjunction with the Human Rights Working Group to complete the review'. The process of the human rights impact assessment involves identifying 'risk through collection of internal and external data and engagement of global colleagues through the Human Rights Working Group and within countries', among other steps. [Sustainability Report 2019, 2020: compass-group.com] • Met: Identifying risks in AG suppliers: The Company states that 'we conduct comprehensive risk assessments of the current and emerging vulnerabilities within the higher risk segments of our supply chain. This is underpinned by expert risk analysis and rigorously researched quantitative political, human rights and environmental risk indices provided by an independent specialist in human rights. The outcomes of these risk assessments and horizon scanning activities help us to identify our priorities as we look to mitigate or eliminate identified risks. We are also developing a Group blueprint to evolve and develop our approach to purchasing and in order to ensure we have stronger policies, standards and controls'. [Sustainability Report 2019, 2020: compass-group.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Ongoing global risk identification: As indicated above, the Company stated the process during last reporting year. [Sustainability Report 2019, 2020: compass-group.com] • Not met: In consultation with stakeholders • Not met: In consultation with HR experts: As indicated above, the Company indicates that 'we engaged the help of independent external human rights specialists who are working in conjunction with the Human Rights Working Group to complete the review'. Moreover, in its Human Rights Policy, the Company indicates that 'We are committed to conducting ongoing human rights due diligence throughout our business and supply chain, and work with third party specialists by geography and issue'. However, no further details found, including entity(ies) with which the Company is collaborating, neither in the 2019 Sustainability Report nor in the 2019 Modern Slavery and Human Trafficking Statement. [Sustainability Report 2019, 2020: compass-group.com & Modern Slavery and Human Trafficking Statement 2019, 16/12/19: compass-group.com] • Not met: Triggered by new circumstances • 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:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Salient risk assessment (and context): The Company indicates that 'in some of our business sectors and in certain geographic regions where we operate, the risk of human trafficking, slavery or child labour being used is higher'. 'In 2016-2017, our Group HR team commissioned a third party to conduct detailed due diligence assessment of adherence to Company policies for those countries viewed to be of a higher risk of slave labour and human trafficking. The review comprised seven countries and we found that there was a high level of compliance with our policies and procedures'. No further evidence found in latest reports. [Slavery & Human Trafficking statement, 2017: compass-group.com] • Not met: Public disclosure of salient risks <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	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Action Plans to mitigate risks: The Company indicates that it has initiated a Human Rights Risk Assessment across the Group. The process of the human rights impact assessment includes identifying 'mitigation through analysis of data, working with internal ambassadors, champions and change makers; (...) implement mitigation across highlighted areas'. However, no description found of a global system to take action to prevent, mitigate or remediate its human rights salient issues. [Modern Slavery and Human Trafficking Statement 2019, 16/12/19: compass-group.com] • Not met: Including in AG supply chain: The Company indicates that 'Over the last 12 months we have been categorising our supply chain to identify areas of higher risk, in specific countries and with specific commodities, as part of our Human Rights Impact Assessment and we will report on the outcome in next year's statement'. However, no details found in relation to the system to take action, mitigate or remediate its salient human rights issues applies to its supply chain, following risk assessment. [Modern Slavery and Human Trafficking Statement 2019, 16/12/19: compass-group.com] • Met: Example of Actions decided: The following example is mentioned in the Human Trafficking statement: 'Our businesses in the UAE, Qatar and Saudi Arabia source the majority of labour from India, Nepal, Bangladesh and the Philippines. Strict vetting procedures are in place for all overseas labour agencies and we only contract with those registered and approved by local government agencies. All labour agencies are required to adhere to our Code of Business Conduct and would be terminated for any breach. Additional checks and controls are in place from recruitment through to commencement of employment to confirm that our standards and procedures are adhered to'. The Company also indicates that has established an e-learning programme for procurement teams to help identify and mitigate potential risks from supply chain. It describes how it is being rolled out. [Slavery and Human Trafficking Statement, 01/10/2018: compass-group.com & Annual Report 2018, 20/10/2018: compass-group.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met
B.2.4	Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: System to check if Actions are effective • Not met: Lessons learnt from checking effectiveness <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 • Not 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 <p>Score 2</p> <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	<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 code of business conduct states that 'Speak Up is a Group-wide facility in Compass for our people to confidentially raise their concerns over actions and behaviour that they feel may be improper, unsafe, unethical or even illegal; issues that they feel they cannot raise with their Line Manager or through normal procedures. Employees can do this via a confidential telephone helpline and web-site, which is run by an independent specialist provider and is available 7 days a week, 24 hours a day. [Code of business conduct, 01/2018: compass-group.com & Speak up website, N/A: compass-speakup.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Number grievances filed, addressed or resolved: The Company states that 'in the 12 months to September 2018, there were 3,812 reports raised and in the 12 months to September 2019 there were 3,736 reports. None of these reports related to concerns regarding slavery and human trafficking'. However, no further details found regarding other human rights issues. [Modern Slavery and Human Trafficking Statement 2019, 16/12/19: compass-group.com] • Met: Channel is available in all appropriate languages: The Code of business conduct indicates that 'In many countries, the Speak up helpline has been set-up in more than one language'. The Speak up website is available in 32 languages (plus English) [Code of business conduct, 01/2018: compass-group.com & Speak up website, N/A: compass-speakup.com] • Met: Opens own system to AG supplier workers: The Supply chain policy indicates that 'Speak up is a group-wide programme for Compass employees and suppliers to confidentially raise their concerns over actions or behaviour that they feel may be improper, unsafe, unethical, or illegal'. [Supply Chain Integrity Policy 2018, 06/2018: compass-group.com]
C.2	Grievance channel(s)/mechanism(s) to receive complaints or concerns from external individuals and communities	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: Grievance mechanism for community: The Company indicates that 'globally, the Group Internal Audit function manage an independently operated helpline and website (Speak Up) where our people, suppliers and members of the community can report concerns in confidence if they so choose'. [Modern Slavery and Human Trafficking Statement 2019, 16/12/19: compass-group.com & Speak up website, N/A: compass-speakup.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Describes accessibility and local languages: The Company states that 'we have translated details of the independent service into 34 languages to allow our employees around the globe to understand it'. As indicated above, the channel seems to be open to anyone affected (and the process asks the complainant about relationship with the company including whether complainant is an employee). [Speak up website, N/A: compass-speakup.com] • Met: AG supplier communities use global system: As indicated above, the channel is open to suppliers and members of the community. [Modern Slavery and Human Trafficking Statement 2019, 16/12/19: compass-group.com & Speak up website, N/A: compass-speakup.com]
C.7	Remedying adverse impacts and incorporating lessons learned	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"> • Not met: Describes how remedy has been provided • Not met: Says how it would remedy key sector risks: In its Human Rights Policy, the Company states that 'Compass Group is committed to acting with integrity as a responsible business in all our operations globally. This commitment extends to providing access to or cooperating with the remediation of any breaches of human rights we identify we have caused or contributed to in our operations. We aim to achieve this through our Speak Up mechanisms designed to enable effective remedy while not preventing access to other forms of remedy if justified'. Moreover, in its Modern Slavery and Human Trafficking Statement 2019, it indicates that 'when a case is raised, appropriate investigations and remedial actions are undertaken. If such a case related to a supplier, action could include remediation or the potential termination of the relevant supply contract'. However, it is not clear the Company's the approach to provide or enable a timely remedy for victims. [Modern Slavery and Human Trafficking Statement 2019, 16/12/19: compass-group.com & 2020 Human Rights Policy, 06/2020: compass-group.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Approach to learning from incident to prevent future impacts: It states that 'We have an embedded continuous improvement process designed to investigate,

Indicator Code	Indicator name	Score (out of 2)	Explanation
			remediate and resolve issues when raised. This model forms part of our overall Ethics & Compliance programme, where we operate a continuous learning and improvement cycle. It includes the identification of root causes and corrective actions developed in response to lessons learned from our Speak Up cases'. [2020 Human Rights Policy, 06/2020: compass-group.com] <ul style="list-style-type: none"> • Not met: Evaluation of the channel/mechanism

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

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

Disclaimer

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

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

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