

Company Name Geely
Industry Automobiles
Overall Score (*) 8.7 out of 100

| Theme Score | Out of | For Theme |
|-------------|--------|---|
| 0.0 | 10 | A. Governance and Policies |
| 0.0 | 25 | B. Embedding Respect and Human Rights Due Diligence |
| 3.3 | 15 | C. Remedies and Grievance Mechanisms |
| 1.1 | 20 | D. Performance: Company Human Rights Practices |
| 1.7 | 20 | E. Performance: Responses to Serious Allegations |
| 2.5 | 10 | F. Transparency |

(*) While other sectors are being measured against a reduced set of CHRB Core UNGP Indicators this year the Automotive Manufacturing sector is being measured against the full CHRB Methodology as it is the first year that the sector has been analysed.

Please note that any small differences between the Overall Score and the added total of Measurement Theme scores are due to rounding the numbers at different stages of the score calculation process.

Please note also 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

A. Governance and Policies (10% of Total)

A.1 Policy Commitments (5% of Total)

| Indicator Code | Indicator name | Score (out of 2) | Explanation |
|----------------|---|------------------|--|
| A.1.1 | Commitment to respect human rights | 0 | The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: General HRs commitment Not met: UNGC principles 1 & 2 Not met: UDHR Not met: International Bill of Rights Score 2 <ul style="list-style-type: none"> Not met: UNGPs Not met: OECD |
| A.1.2 | Commitment to respect the human rights of workers | 0 | The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: ILO Core: The Company indicates, in its 2018 CSR Report, that 'We have signed seven collective agreements with our employees, such as Labour Contract, Special Wage Collective Contract and Agreement on Protection of Rights and Interests of Female Workers, to protect their fundamental rights'. Moreover, it in its 2019 CSR, it explains that 'Geely seeks to create an equal, fair and harmonious work environment for every employee. We have adopted methods that are suited to the local circumstances to establish cross-cultural communication and integration, and consolidated global talents of different histories and cultural backgrounds'. However, no publicly available statement found of a policy |

| Indicator Code | Indicator name | Score (out of 2) | Explanation |
|----------------|--|------------------|---|
| | | | <p>committing it to respect the human rights that the ILO has declared to be fundamental rights at work. [2018 Social Responsibility Report, 06/2019: geelyauto.com.hk & 2019 CSR Report, 04/2020: geelyauto.com.hk]</p> <ul style="list-style-type: none"> • Not met: UNGC principles 3-6 • Not met: Explicitly list ALL four ILO for MO suppliers <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Explicit commitment to All four ILO Core: The Company indicates, in its 2018 CSR Report, that 'Geely is committed to creating an equal, fair and harmonious working environment, paying attention to cultural integration, rejecting discrimination in race, nationality, religion, disability, gender, education, etc. We firmly oppose child labour and refuse forced labour'. Moreover, in its 2019 CSR Report, it states that 'We reject discrimination stemming from race, nationality, religion, disability, gender and education, and we reject forced labour too. At the same time, we strictly abide to the national and local laws and regulations, and forbid the employment of children under 16'. However, no policy statement found of commitment to respecting freedom of association and the right to collective bargaining found. [2018 Social Responsibility Report, 06/2019: geelyauto.com.hk & 2019 CSR Report, 04/2020: geelyauto.com.hk] • Not met: Respect H&S of workers: The Company indicates, in its 2018 CSR Report, that 'With the safety production information platform, Geely comprehensively promoted the construction of safety production standardisation (...). At the same time, we actively carried out occupational hazard identification and risk management and control, and continuously strengthened employee safety education and training. (...) Geely cares for the health of employees and their families'. No further evidence found in its 2019 CSR Report. [2018 Social Responsibility Report, 06/2019: geelyauto.com.hk] • Not met: H&S applies to MO suppliers • Not met: Working hours for workers • Not met: Working hours for MO suppliers |
| A.1.3.MO.a | Commitment to responsible sourcing of minerals | 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: Responsible mineral sourcing in conflict areas • Not met: Based on OECD Guidance • Not met: Requires responsible mineral sourcing from suppliers • Not met: Requires suppliers to follow the OECD Guidance <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Responsible conflict mineral sourcing covers all minerals • Not met: Suppliers expected to make similar requirements of their suppliers |
| A.1.3.MO.b | Commitment to respect human rights particularly relevant to the industry (ICT) | 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: Women's Rights • Not met: Children's Rights • Not met: Migrant worker's rights • Not met: Expecting suppliers to respect these rights <p>Score 2</p> <ul style="list-style-type: none"> • Not met: CEDAW/Women's Empowerment Principles • Not met: Child Rights Convention/Business principles • Not met: Convention on migrant workers • Not met: Respecting the right to water • Not met: Expecting suppliers to respect these rights |
| A.1.4 | Commitment to engage with stakeholders | 0 | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Commits to stakeholder engagement: The Company indicates that 'Geely has steadily strived to maintain positive and effective collaboration and communication with its stakeholders'. However, no publicly available formal statement of commitment to engage with its potentially and actually affected stakeholders found. [2019 CSR Report, 04/2020: geelyauto.com.hk] • Not met: Regular stakeholder engagement <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 | 0 | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Commits to remedy <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Not obstructing access to other remedies • Not met: Collaborating with other remedy initiatives • Not met: Work with MO suppliers to remedy impacts |

| Indicator Code | Indicator name | Score (out of 2) | Explanation |
|----------------|--|------------------|---|
| A.1.6 | Commitment to respect the rights of human rights defenders | 0 | The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: Zero tolerance attacks on HRs Defenders (HRDs): The Company indicates that 'Persons making appropriate complaints in accordance with this policy are assured of protection against unfair dismissal, victimisation or unwarranted disciplinary action, even if the suspected concerns are confirmed to be unsubstantiated after formal internal investigation. Persons who victimise or retaliate against those who have raised concerns under this policy will be subject to disciplinary and/or legal actions'. However, no evidence found of publicly available statement committing to neither tolerate nor contribute to threats against human rights defenders in relation to its operations. [Whistleblowing Policy, 29/12/2017: geelyauto.com.hk] Score 2 <ul style="list-style-type: none"> Not met: Expects MO suppliers to reflect company HRD commitments |

A.2 Policy Commitments (5% of Total)

| Indicator Code | Indicator name | Score (out of 2) | Explanation |
|----------------|---------------------------------------|------------------|---|
| A.2.1 | Commitment from the top | 0 | The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: CEO or Board approves policy Not met: Board level oversight for HRs: The Company indicates that 'The board of directors is responsible for the supervision of Geely's social, environmental and governance matters'. However, it is not clear that it includes oversight of one or more areas of respect for human rights (no explicit inclusion of human rights matters found). [2019 CSR Report, 04/2020: geelyauto.com.hk] Score 2 <ul style="list-style-type: none"> Not met: Speeches/letters by Board members or CEO |
| A.2.2 | Board discussions | 0 | The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: Board/Committee review of salient HRs Not met: Examples or trends re HR discussion Score 2 <ul style="list-style-type: none"> Not met: Both examples and process |
| A.2.3 | Incentives and performance management | 0 | The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: Incentives for at least one board member Not met: At least one key MO HR risk, beyond employee H&S Score 2 <ul style="list-style-type: none"> Not met: Performance criteria made public |

B. Embedding Respect and Human Rights Due Diligence (25% of Total)

B.1 Embedding Respect for Human Rights in Company Culture and Management Systems (10% of Total)

| Indicator Code | Indicator name | Score (out of 2) | Explanation |
|----------------|--|------------------|---|
| B.1.1 | Responsibility and resources for day-to-day human rights functions | 0 | The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: Commits to ILO core conventions Not met: Senior responsibility for HR Score 2 <ul style="list-style-type: none"> Not met: Day-to-day responsibility Not met: Day-to-day responsibility for MO in supply chain |
| B.1.2 | Incentives and performance management | 0 | The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: Senior manager incentives for human rights Not met: At least one key MO HR risk, beyond employee H&S Score 2 <ul style="list-style-type: none"> Not met: Performance criteria made public |
| B.1.3 | Integration with enterprise risk management | 0 | The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: HR risks is integrated as part of enterprise risk system Score 2 <ul style="list-style-type: none"> Not met: Audit Ctte or independent risk assessment |
| B.1.4.a | Communication /dissemination of policy commitment(s) | 0 | The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: Commits to ILO core conventions |

| Indicator Code | Indicator name | Score (out of 2) | Explanation |
|----------------|--|------------------|--|
| | within Company's own operations | | <ul style="list-style-type: none"> • Not met: Communicates its policy to all workers in own operations: The Company indicates that 'Geely adheres to the road of technological innovation and independently develops the C3 mobile phone system with easy-to-use functions, rich information and friendly interface to provide professional human resources services for all Geely employees. Using the APP, employees can learn about company information, look up personal information and other self-service, and communicate through forums and employee communities. The APP has dramatically enhanced the employee experience'. However, it is not clear it also communicates its policy commitment(s) to all workers, including local languages where necessary. No further evidence found in the 2019 CSR Report. [2018 Social Responsibility Report, 06/2019: geelyauto.com.hk] Score 2 • Not met: Commits to all 4 ILO core conventions • Not met: Communication of policy commitments to stakeholder: The Company indicates that 'Geely has steadily strived to maintain positive and effective collaboration and communication with its stakeholders'. However, it is not clear how it communicates its policy commitments to stakeholders, including local communities and potentially affected stakeholders. [2019 CSR Report, 04/2020: geelyauto.com.hk] • Not met: How policy commitments are made accessible to audience |
| B.1.4.b | Communication /dissemination of policy commitment(s) to business relationships | 0 | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Commits to all 4 ILO core conventions for suppliers • Not met: Communicating policy down the whole MO supply chain: The Company indicates that 'With the continuous standardisation of Geely's procurement business process, the procurement information system has been upgraded to SRM84.0, which enables full-process management of supplier access certification mechanisms and procurement processes, as well as reduce overall operational cost. We have a comprehensive control over the construction of the supplier system'. However, it is not clear the steps it takes to communicate its human rights policy commitment(s) to its business relationships including direct and indirect suppliers. No further evidence found in the 2019 CSR Report. [2018 Social Responsibility Report, 06/2019: geelyauto.com.hk] • Not met: Requiring MO suppliers to communicate policy down the chain <p>Score 2</p> <ul style="list-style-type: none"> • Not met: How HR commitments made binding/contractual • Not met: Including on MO suppliers |
| B.1.5 | Training on Human Rights | 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: Scores at least 1 on A.1.2 • Not met: Trains all workers on HR policy commitments: The Company indicates that 'we actively carried out occupational hazard identification and risk management and control, and continuously strengthened employee safety education and training'. Moreover, in its 2019 CSR Report, it explains that 'With respect to occupational disease protection, we follow requirements from the ISO 45001 and OHSAS 18001 to build our occupational health and safety management system, which includes (...) organising occupational health and safety training and evaluation for employees to ensure that employees are equipped with the relevant safety operation and prevention measurements'. However, it is not clear that all its workers are trained on its human rights policy commitment(s). [2018 Social Responsibility Report, 06/2019: geelyauto.com.hk & 2019 CSR Report, 04/2020: geelyauto.com.hk] • Not met: Trains relevant MO managers including procurement <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Score of 2 on A.1.2 • Not met: Both requirements under score 1 met |
| B.1.6 | Monitoring and corrective actions | 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: Scores at least 1 on A.1.2 • Not met: Monitoring implementation of HR policy commitments • Not met: Monitoring MO suppliers: The Company indicates that 'In 2019, we strengthened the supplier risk management and control, and incorporated environmental and social impact assessments in suppliers' audits and evaluations. Component suppliers are required to pass (...) OHSAS 18000 occupational health and safety certification, meet local environmental requirements, and use eco-friendly products as much as possible'. However, it is not clear how it includes monitoring its implementation of its human rights policy commitment(s). [2019 CSR Report, 04/2020: geelyauto.com.hk] |

| Indicator Code | Indicator name | Score (out of 2) | Explanation |
|----------------|---|------------------|---|
| | | | <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Score of 2 on A.1.2 • Not met: Describes corrective action process • Not met: Example of corrective action • Not met: Discloses % of MO supply chain monitored |
| B.1.7 | Engaging business relationships | 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: HR affects MO selection of suppliers: The Company indicates that 'Geely has established standards for suppliers' entry, evaluation and phasing out, and conducted "pyramid" dynamic management and optimisation for suppliers according to 3 dimensions, which are R&D, manufacturing and quality assurance'. However, it is not clear how human rights performance is taken into account in the identification and selection of potential business relationships. [2019 CSR Report, 04/2020: geelyauto.com.hk] • Not met: HR affects on-going MO supplier relationships: Regarding supplier performance reviews, the 2018 CSR Report states that 'We divided the evaluation results into four grades, A, B, C, and D, sorting from the best to the worst, and formulated the corresponding reward and punishment measures. According to the annual assessment of suppliers, we introduce excellent suppliers every year and eliminate the worst 20 suppliers. In 2018, the proportion of grade A and B suppliers increased from 75% in 2017 to 90%'. Moreover, in its 2019 CSR Report, it states that 'For strategic suppliers ranked at the top of the "pyramid", we give more resource support and privileges, such as quota allocation and new project development; for suppliers with insufficient capabilities, we set up a quality management college to carry out customised training projects; the suppliers that we phase out are companies with low coordination, worsening quality problems and integrity, and compliance problems'. However, it is not clear how human rights performance is taken into account in how this performance affects relationship. [2018 Social Responsibility Report, 06/2019: geelyauto.com.hk & 2019 CSR Report, 04/2020: geelyauto.com.hk] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirement under score 1 met • Not met: Working with MO suppliers to improve performance: It states that 'Through measures such as supplier trainings, technology annual meetings, and in-situ follow-up guidance from Geely's engineers, Geely has comprehensively improved the compliance and innovation capabilities of its suppliers'. However, it is not clear how it works with business relationships to improve human rights performance, moreover, no example was found. [2019 CSR Report, 04/2020: geelyauto.com.hk] |
| B.1.8 | Approach to engagement with potentially affected stakeholders | 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: Stakeholder process or systems: The Company discloses a list of stakeholders, with focused topics for each group and their responses to them. 'Combining factors such as Geely's business modules, operation management and material topics, we identified 8 categories of stakeholders that are important to Geely's development. They are namely the government and regulators, investors, customers, employees, suppliers, dealers, the environment and society'. However, it is not clear how it has identified and engaged with affected and potentially affected stakeholders in the last two years. [2019 CSR Report, 04/2020: geelyauto.com.hk] • Not met: Frequency and triggers for engagement • Not met: Workers in MO SC engaged: Suppliers are among the listed stakeholders, however, it is not clear the engagement includes workers or local communities in its supply chain. No further evidence was found in the 2019 CSR Report. [2018 Social Responsibility Report, 06/2019: geelyauto.com.hk] • Not met: Communities in the MO SC engaged <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Analysis of stakeholder views and company's actions on them |

B.2 Human Rights Due Diligence (15% of Total)

| Indicator Code | Indicator name | Score (out of 2) | Explanation |
|----------------|--|------------------|--|
| 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 <ul style="list-style-type: none"> • Not met: Identifying risks in own operations • Not met: Identifying risks in MO suppliers Score 2 <ul style="list-style-type: none"> • Not met: Ongoing global risk identification • Not met: In consultation with stakeholders • Not met: In consultation with HR experts • Not met: Triggered by new circumstances |
| B.2.2 | Assessing: Assessment of risks and impacts identified (salient risks and key industry risks) | 0 | The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Salient risk assessment (and context) • Not met: Public disclosure of salient risks Score 2 <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 | 0 | The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Action Plans to mitigate risks • Not met: Including in MO supply chain • Not met: Example of Actions decided Score 2 <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met |
| B.2.4 | Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts | 0 | The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: System to check if Actions are effective • Not met: Lessons learnt from checking effectiveness Score 2 <ul style="list-style-type: none"> • Not met: Both requirement under score 1 met |
| B.2.5 | Communicating : Accounting for how human rights impacts are addressed | 0 | The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Comms plan re identifying risks • Not met: Comms plan re assessing risks • Not met: Comms plan re action plans for risks • Not met: Comms plan re reviewing action plans • Not met: Including MO suppliers Score 2 <ul style="list-style-type: none"> • Not met: Responding to affected stakeholders concerns • Not met: Ensuring affected stakeholders can access communications |

C. Remedies and Grievance Mechanisms (15% of Total)

| Indicator Code | Indicator name | Score (out of 2) | Explanation |
|----------------|--|------------------|--|
| C.1 | Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers | 1.5 | The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Channel accessible to all workers: The whistleblowing policy states that 'Geely Automobile Holdings Limited (...) and its subsidiaries (...) are committed to the highest possible standards of openness, probity and accountability. In line with this commitment, this policy aims to provide an avenue for employees, suppliers, customers, etc., who deal with the Group (...) to raise any suspected misconduct or malpractice within the Group (the "Whistleblower"). It then has disclosed 2 reporting channels, mail and email. [Whistleblowing Policy, 29/12/2017: geelyauto.com.hk] Score 2 <ul style="list-style-type: none"> • Not met: Number grievances filed, addressed or resolved • Not met: Channel is available in all appropriate languages |

| Indicator Code | Indicator name | Score (out of 2) | Explanation |
|----------------|---|------------------|--|
| | | | <ul style="list-style-type: none"> • Met: Opens own system to MO supplier workers: The Company indicates, its whistleblowing policy, that 'Geely Automobile Holdings Limited (...) and its subsidiaries (...) are committed to the highest possible standards of openness, probity and accountability. In line with this commitment, this policy aims to provide an avenue for employees, suppliers, customers, etc., who deal with the Group (...) to raise any suspected misconduct or malpractice within the Group (the "Whistleblower"). It then has disclosed 2 reporting channel, mail and email. [Whistleblowing Policy, 29/12/2017: geelyauto.com.hk] |
| C.2 | Grievance channel(s)/mechanism(s) to receive complaints or concerns from external individuals and communities | 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: Grievance mechanism for community: The whistleblowing policy states that 'Geely Automobile Holdings Limited (...) and its subsidiaries (...) are committed to the highest possible standards of openness, probity and accountability. In line with this commitment, this policy aims to provide an avenue for employees, suppliers, customers, etc., who deal with the Group (...) to raise any suspected misconduct or malpractice within the Group (the "Whistleblower"). It then has disclosed 2 reporting channels, mail and email. The policy applies to all group employees 'and other related stakeholders'. [Whistleblowing Policy, 29/12/2017: geelyauto.com.hk] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Describes accessibility and local languages • Not met: Expects MO supplier to have community grievance systems • Not met: MO supplier communities use global system |
| C.3 | Users are involved in the design and performance of the channel(s)/mechanism(s) | 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: Engages users to create or assess system • Not met: Example of how they do this <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Engages with users on system performance • Not met: Provides user engagement example on performance • Not met: MO suppliers consult users in creation or assessment |
| C.4 | Procedures related to the mechanism(s)/channel(s) are publicly available and explained | 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: Response timescales: The Company indicates that the 'Head of Internal Audit Department will acknowledge receipt of your report within 3 working days confirming that: Your report has been received; An independent project code will be opened; and Subject to whistle blowing nature and situation, more information will be obtained from whistleblower. The Whistle blowing case will be classified into two investigation procedures: A.) Pursuable Whistle blowing reports or B.) Non-pursuable Whistle blowing reports'. Regarding pursuable Whistle blowing reports, the Company 'will inform the investigation result to the Whistle blower. (...) For the non-pursuable reports, Internal Audit Department will inform the result to Whistle blower in ONE month, and present to the Audit Committee of the Group'. Moreover, 'You will receive in writing the outcome of the investigation. (...) Subject to the nature and complexity of the matter, we expect to complete the investigation and provide you with the outcome in 3 months'. [Whistleblowing Policy, 29/12/2017: geelyauto.com.hk] • Met: How complainants will be informed: See above. [Whistleblowing Policy, 29/12/2017: geelyauto.com.hk] • Met: Who is handling the complaint <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Escalation to senior/independent level: The Company also indicates that 'If the report is extremely serious or in any way involves the Head of Internal Audit Department as the reporting subject, you should report it directly to the Chairman of the Audit Committee'. The Company provides the Chairman address. It is not clear this channel can be used by all external individuals and communities, and whether the escalation can be made at the complainants discretion (doesn't agree with the outcome). [Whistleblowing Policy, 29/12/2017: geelyauto.com.hk] |
| C.5 | Commitment to non-retaliation over complaints or concerns made | 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: Public statement prohibiting retaliation: The Whistleblowing policy states that 'Persons making appropriate complaints in accordance with this policy are assured of protection against unfair dismissal, victimisation or unwarranted disciplinary action, even if the suspected concerns are confirmed to be unsubstantiated after formal internal investigation'. The policy scope includes 'Group at all levels and divisions, managements, employees and other related stakeholders'. [Whistleblowing Policy, 29/12/2017: geelyauto.com.hk] |

| Indicator Code | Indicator name | Score (out of 2) | Explanation |
|----------------|---|------------------|--|
| | | | <ul style="list-style-type: none"> • Not met: Practical measures to prevent retaliation: The Company indicates that 'The Group respect that sometimes you may wish to file the report in confidence. However, an anonymous allegation will be much more difficult for us to follow up simply because we will not be able to obtain further information from you and make a proper assessment. The Group generally do not encourage anonymous reporting which will usually not be considered, and encourage you to come forward with your concerns'. Moreover, 'Persons who victimise or retaliate against those who have raised concerns under this policy will be subject to disciplinary and/or legal actions'. However, no details found in relation to specific training regarding this policy in order to implement disciplinary or other actions to prevent retaliation. [Whistleblowing Policy, 29/12/2017: geelyauto.com.hk] Score 2 <ul style="list-style-type: none"> • Not met: Has not retaliated in practice • Not met: Expects MO suppliers to prohibit retaliation |
| C.6 | Company involvement with State-based judicial and non-judicial grievance mechanisms | 0 | The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Won't impede state based mechanisms • Not met: Complainants not asked to waive rights Score 2 <ul style="list-style-type: none"> • Not met: Will work with state based or non judicial mechanisms • Not met: Example of issue resolved (if applicable) |
| C.7 | Remedying adverse impacts and incorporating lessons learned | 0 | The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Describes how remedy has been provided • Not met: Says how it would remedy key sector risks Score 2 <ul style="list-style-type: none"> • Not met: Changes introduced to stop repetition • Not met: Approach to learning from incident to prevent future impacts • Not met: Evaluation of the channel/mechanism: The Company indicates that 'The effectiveness of this whistleblowing policy will be monitored and reviewed periodically by Internal Audit Department'. However, no evaluation of the effectiveness of the grievance channels found. [Whistleblowing Policy, 29/12/2017: geelyauto.com.hk] |

D. Performance: Company Human Rights Practices (20% of Total)

D.5 Automotive Manufacturing

| Indicator Code | Indicator name | Score (out of 2) | Explanation |
|----------------|---|------------------|---|
| D.5.1.a | Living wage (in own production or manufacturing operations) | 0 | The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Living wage target timeframe: The Company indicates that it has signed the 'Income-Specialised Collective Contract'. Moreover, it states that 'Geely continues to refine our company welfare system, which provides seasonal, festive and birthday benefits, annual health check, as well as subsidies for housing, transport, meals, telecommunication and discounts for car purchase. Similarly, Geely strictly abides to the national laws and standards for annual, sick, maternity and paternity, as well as compassionate leave'. Also, 'we have created a "tiered, hierarchical and transparent" performance evaluation and encouragement system to bring Geely's welfare and competitive opportunities to employee in a fair and open manner'. The System is meant to all employees. 'For front-line employees, Geely has built an income system which combines basic salary for position-specific work done and performance-based bonuses'. However, it is not clear its target timeframe for paying all workers a living wage or a statement indicating that it already pays living wage to all employees. [2019 CSR Report, 04/2020: geelyauto.com.hk] Score 2 <ul style="list-style-type: none"> • Not met: Describes how living wage determined • Not met: Achieved payment of living wage • Not met: Regularly review definition of living wage with unions |
| D.5.1.b | Living wage (in the supply chain) | 0 | The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Living wage in supplier code or contracts • Not met: Improving living wage practices of suppliers Score 2 <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met • Not met: Provide analysis of trends demonstrating progress |

| Indicator Code | Indicator name | Score (out of 2) | Explanation |
|----------------|---|------------------|---|
| D.5.2 | Aligning purchasing decisions with human rights | 0 | The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Avoids business model pressure on HRs • Not met: Positive incentives to respect human rights: The Company indicates in its 2018 CSR Report, that 'Geely conducts supplier performance reviews quarterly from the four aspects of supplier quality, cost, delivery and technology. We divided the evaluation results into four grades, A, B, C, and D, sorting from the best to the worst, and formulated the corresponding reward and punishment measures'. Moreover, in its 2019 CSR Report, it states that 'For strategic suppliers ranked at the top of the "pyramid", we give more resource support and privileges, such as quota allocation and new project development; for suppliers with insufficient capabilities'. However, it is not clear the Company has specific positive incentives it puts into place via its purchasing practices to encourage its business relationships to act with respect for human rights. [2018 Social Responsibility Report, 06/2019: geelyauto.com.hk & 2019 CSR Report, 04/2020: geelyauto.com.hk] Score 2 <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met |
| D.5.3 | Mapping and disclosing the supply chain | 0 | The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Identifies suppliers back to product source Score 2 <ul style="list-style-type: none"> • Not met: Discloses significant parts of supply chain and why |
| D.5.4.a | Prohibition on child labour: Age verification and corrective actions (in own production or manufacturing operations) | 0.5 | The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Does not use child labour: The Company indicates that 'We firmly oppose child labour'. No further evidence found in the latest reports. [2018 Social Responsibility Report, 06/2019: geelyauto.com.hk] • Not met: Age verification of job applicants and workers Score 2 <ul style="list-style-type: none"> • Not met: Remediation if children identified |
| D.5.4.b | Prohibition on child labour: Age verification and corrective actions (in the supply chain) | 0 | The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Child Labour rules in codes or contracts • Not met: How working with suppliers on child labour Score 2 <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met • Not met: Provide analysis of trends demonstrating progress |
| D.5.5.a | Prohibition on forced labour: Debt bondage and other unacceptable financial costs (in own production or manufacturing operations) | 0 | The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Pays workers in full and on time • Not met: Payslips show any legitimate deductions Score 2 <ul style="list-style-type: none"> • Not met: How these practices are implemented and monitored for agencies, labour brokers or recruiters |
| D.5.5.b | Prohibition on forced labour: Debt bondage and other unacceptable financial costs (in the supply chain) | 0 | The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Debt and fees rules in codes or contracts • Not met: How working with suppliers on debt & fees Score 2 <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met • Not met: Provide analysis of trends in progress made |
| D.5.5.c | Prohibition on forced labour: Restrictions on workers (in own production or manufacturing operations) | 0 | The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Does not retain documents or restrict movement Score 2 <ul style="list-style-type: none"> • Not met: How sure about agencies or brokers |

| Indicator Code | Indicator name | Score (out of 2) | Explanation |
|----------------|--|------------------|---|
| D.5.5.d | Prohibition on forced labour: Restrictions on workers (in the supply chain) | 0 | The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Free movement rules in codes or contracts • Not met: How these practices are implemented and monitored for agencies, labour brokers or recruiters Score 2 <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met • Not met: Provide analysis of trends in progress made |
| D.5.6.a | Freedom of association and collective bargaining (in own production or manufacturing operations) | 1 | The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Commits not to interfere with union rights and collective bargaining and prohibits intimidation and retaliation: The Company indicates that ‘Employees can participate in the enterprise management activities democratically, through channels such as the Union Representative Council and the Collective Enterprise Negotiation. Such an approach is of benefit to a more holistic protection system for employees’ rights’. High union recognition, in this case 100 percent, is taken as a proxy for not intimidating or retaliating. However, no commitment found to not interfering with the right of workers to form or join trade unions (or equivalent worker bodies where the right to freedom of association and collective bargaining is restricted under law) to bargain collectively. [2019 CSR Report, 04/2020: geelyauto.com.hk] • Met: Discloses % covered by collective bargaining: The proportion of employees in labor union in 2019 was 100. [2019 CSR Report, 04/2020: geelyauto.com.hk] Score 2 <ul style="list-style-type: none"> • Not met: Both requirement under score 1 met |
| D.5.6.b | Freedom of association and collective bargaining (in the supply chain) | 0 | The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: FoA & CB rules in codes or contracts • Not met: How working with suppliers on FoA and CB Score 2 <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met • Not met: Provide analysis of trends in progress made |
| D.5.7.a | Health and safety: Fatalities, lost days, injury rates (in own production of manufacturing operations) | 1 | The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Injury Rate disclosures: The accident rates of severe injuries in 2019 were 0.020, while the accident rates of light injuries were 0.20. [2019 CSR Report, 04/2020: geelyauto.com.hk] • Met: Fatalities disclosures: The number of work-related fatalities in 2019 was 0. [2019 CSR Report, 04/2020: geelyauto.com.hk] Score 2 <ul style="list-style-type: none"> • Not met: Set targets for H&S performance • Not met: Met targets or explains why not |
| D.5.7.b | Health and safety: Fatalities, lost days, injury rates (in the supply chain) | 0 | The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Sets out clear Health and Safety requirements • Not met: Injury rate disclosures • Not met: Lost days or near miss disclosures • Not met: Fatalities disclosures Score 2 <ul style="list-style-type: none"> • Not met: How working with suppliers on H&S • Not met: Provide analysis of trends in progress made |
| D.5.8.a | Women's rights (in own production or manufacturing operations) | 0 | The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Process to stop harassment and violence: The Company indicates, in its 2018 CSR Report, that ‘With an “open, respectful and tolerate” attitude, we have created a harmonious working environment for each employee’. Moreover, in its 2019 CSR Report, it states that ‘We reject discrimination stemming from (...) gender’. However, it is not clear its processes to prohibit harassment, intimidation and violence against women. [2018 Social Responsibility Report, 06/2019: geelyauto.com.hk & 2019 CSR Report, 04/2020: geelyauto.com.hk] • Not met: Working conditions take account of gender: The Company indicates that ‘With our employees, we have signed 7 collective contracts, including (...) the Regulations Concerning the Labour Protection of Female Staff and Worker’. However, it is not clear how it takes into account differential impacts on women and men of working conditions, including to reproductive health. [2019 CSR Report, 04/2020: geelyauto.com.hk] |

| Indicator Code | Indicator name | Score (out of 2) | Explanation |
|----------------|---|------------------|---|
| | | | <ul style="list-style-type: none"> • Not met: Equality of opportunity at all levels: The Company indicates that 'Founded on the approach of "respect, adjust, accommodate and integrate", Geely seeks to create an equal, fair and harmonious work environment for every employee'. However, it is not clear how it provides equality of opportunity for women in the workforce that are monitored and maintained throughout all levels of employment. [2019 CSR Report, 04/2020: geelyauto.com.hk] Score 2 <ul style="list-style-type: none"> • Not met: Meets all of the requirements under score 1 |
| D.5.8.b | Women's rights (in the supply chain) | 0 | The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Women's rights in codes or contracts • Not met: How working with suppliers on women's rights Score 2 <ul style="list-style-type: none"> • Not met: Both requirement under score 1 met • Not met: Provide analysis of trends in progress made |
| D.5.9.a | Working hours (in own production or manufacturing operations) | 0 | The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Respects max hours, min breaks and rest periods in its own operations Score 2 <ul style="list-style-type: none"> • Not met: How it implements and checks this |
| D.5.9.b | Working hours (in the supply chain) | 0 | The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Working hours in codes or contracts • Not met: How working with suppliers on working hours Score 2 <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met • Not met: Provide analysis of trends in progress made |
| D.5.10.a | Responsible Mineral Sourcing: Arrangements with Suppliers and Smelters/Refiners in the Mineral Resource Supply Chains | 0 | The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Due diligence in accordance with OECD Guidance in supplier contracts • Not met: Works with smelters/refiners and suppliers to build capacity Score 2 <ul style="list-style-type: none"> • Not met: Contractual requirement to disclosure smelter/refiner information • Not met: Contractual requirement covers all minerals |
| D.5.10.b | Responsible Mineral Sourcing: Risk Identification in Mineral Supply Chain | 0 | The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Risk identification and disclosure in line with OECD Guidance • Not met: Identification of smelter/refiners and OECD Guidance Score 2 <ul style="list-style-type: none"> • Not met: Discloses smelters/refiners judged in line with OECD Guidance • Not met: Risk identification and disclosure covers all minerals |
| D.5.10.c | Responsible Mineral Sourcing: Risk Management in the Mineral Supply Chain | 0 | The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Describes mineral risk management plan for supply chain • Not met: Monitoring, tracking and whether better risk prevention/mitigation over time Score 2 <ul style="list-style-type: none"> • Not met: Disclose better risk prevention/mitigation over time • Not met: Suppliers and stakeholders engaged in risk management strategy • Not met: Risk management and response processes cover all minerals |
| D.5.11 | Responsible Materials Sourcing | [SD.5.10] | The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Due diligence for raw materials in supplier code/contracts • Not met: Works with suppliers to build capacity in risk assessment and due diligence Score 2 <ul style="list-style-type: none"> • Not met: Meets all requirements under score 1 • Not met: Identify the sources of high-risk raw materials in its supply chain |

E. Performance: Responses to Serious Allegations (20% of Total)

| 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, and so the score of 6.94 out of 80 points scored in themes A-D & F has been applied to produce a score of 1.73 out of 20 points for theme E. |

F. Transparency (10% of Total)

| Indicator Code | Indicator name | Score | Explanation |
|----------------|--|---------------|--|
| F.1 | Company willingness to publish information | 0.47 out of 4 | Out of a total of 60 indicators assessed under sections A-D of the benchmark, Geely made data public that met one or more elements of the methodology in 7 cases, leading to a disclosure score of 0.47 out of 4 points. |
| F.2 | Recognised Reporting Initiatives | 2 out of 2 | The individual elements of the assessment are met or not as follows: Score 2 • Met: Company reports on GRI: The Company has a GRI Index. [2019 CSR Report, 04/2020: geelyauto.com.hk] |
| F.3 | Key, High Quality Disclosures | 0 out of 4 | Geely met 0 of the 10 thresholds listed below and therefore gets 0 out of 4 points for the high quality disclosure indicator. Specificity and use of concrete examples • Not met: Score 2 for A.2.2 : Board discussions • Not met: Score 2 for B.1.6 : Monitoring and corrective actions • Not met: Score 2 for C.1 : Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers • Not met: Score 2 for C.3 : Users are involved in the design and performance of the channel(s)/mechanism(s) Discussing challenges openly • Not met: Score 2 for B.2.4 : Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts • Not met: Score 2 for C.7 : Remedying adverse impacts and incorporating lessons learned Demonstrating a forward focus • Not met: Score 2 for A.2.3 : Incentives and performance management • Not met: Score 2 for B.1.2 : Incentives and performance management • Not met: Score 1 for D.5.1.a: Living wage (in own production or manufacturing operations) • Not met: Score 2 for D.5.7.a: Health and safety: Fatalities, lost days, injury rates (in own production of manufacturing operations) |

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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