

**Company Name** Kering  
**Industry** Apparel (Supply Chain only)  
**UNGP Core Score (\*)** 14.0 out of 26

Score	Out of	For indicators
<b>Governance and Policy Commitments</b>		
1	2	A.1.1 Commitment to respect human rights
1.5	2	A.1.2 Commitment to respect the human rights of workers
1	2	A.1.4 Commitment to engage with stakeholders
1	2	A.1.5 Commitment to remedy
<b>Embedding respect and Human Rights Due Diligence</b>		
Embedding respect		
2	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
<b>Remedies and Grievance Mechanisms</b>		
1.5	2	C.1 Grievance channels/mechanisms to receive complaints or concerns from workers
1	2	C.2 Grievance channels/mechanisms to receive complaints or concerns from external individuals and communities
1	2	C.7 Remedying adverse impacts and incorporating lessons learned
<b>14.0</b>	<b>26</b>	

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

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

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

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

## Detailed assessment

### Governance and Policies

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1.1	Commitment to respect human rights	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: UNGC principles 1 &amp; 2: The Company is a signatory to the UN Global Compact since 2008. [Code of Ethics, 2019: <a href="http://keringcorporate.dam.kering.com">keringcorporate.dam.kering.com</a> &amp; UNGC participant website, N/A: <a href="http://unglobalcompact.org">unglobalcompact.org</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: UNGPs: The Company states in its 2019 Code of Ethics: 'The Group's ethical principles of business conduct aim to respect the following key international references: The United Nations Universal Declaration of Human Rights (...); The OECD Guidelines for Multinational Enterprises; (...); The UNGP (United Nations Guiding Principles on Business and Human Rights);' However, 'aim to respect' is not considered a formal statement of commitment following CHRB wording criteria. Additionally, the Company states in its Sustainability Principles, 'The supplier must understand, and comply with the Kering Sustainability Principles and all applicable laws, regulations, directives, collective agreements and supplementary agreements with respect to human rights, worker's rights, environmental protection standards as well as applicable international Conventions and Declarations.' Listed at the end of this document, among a number of initiatives, is the United Nations' Guiding Principles on Business and Human Rights, however, no formal commitment from the Company to the UN Guiding Principles found. [Code of Ethics, 2019: <a href="http://keringcorporate.dam.kering.com">keringcorporate.dam.kering.com</a> &amp; Sustainability Principles, N/A: <a href="http://keringcorporate.dam.kering.com">keringcorporate.dam.kering.com</a>]</li> <li>• Not met: OECD: See above [Code of Ethics, 2019: <a href="http://keringcorporate.dam.kering.com">keringcorporate.dam.kering.com</a>]</li> </ul>
A.1.2	Commitment to respect the human rights of 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"> <li>• Met: UNGC principles 3-6: The Company has been a signatory to the UN Global Compact since 2018. In the supplier's charter the Company discloses the following commitment: 'The Group moreover wishes to emphasize its defense of the 10 principles of the Global Compact, to which it has been a signatory since 2008.' [Code of Ethics, 2019: <a href="http://keringcorporate.dam.kering.com">keringcorporate.dam.kering.com</a> &amp; UNGC participant website, N/A: <a href="http://unglobalcompact.org">unglobalcompact.org</a>]</li> <li>• Met: Explicitly list ALL four ILO for AP suppliers: The suppliers' charter contains requirements regarding child labour, forced labour, discrimination, freedom of association and collective bargaining: in relation to these last two, the charter requires 'to respect employees' directly applicable right of representation and free speech, freedom of association and collective wage bargaining'. In addition, the Sustainability Principles document states: '[...] all of Kering and its brands' suppliers are required to comply with these Principles, and attest that their respective supply chains do likewise.' And with respect freedom of association and collective bargaining the document requires: 'In the event that freedom of association and the right to bargain collectively become limited by law, the supplier and its actors must allow its workers to freely elect their own representatives. [...] Where the right to freedom of association and collective bargaining is restricted under law, the supplier and its sub-suppliers will facilitate, and not hinder, the development of parallel means for independent and free association and bargaining'. [Sustainability Principles, N/A: <a href="http://keringcorporate.dam.kering.com">keringcorporate.dam.kering.com</a> &amp; Code of Ethics, 2019: <a href="http://keringcorporate.dam.kering.com">keringcorporate.dam.kering.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Explicit commitment to All four ILO Core: The Company's principles of business practices contained in the code of ethics, in relation to human rights state that: 'We ban child and forced labor'. 'We encourage freedom of expression for employees of the Group'. 'We encourage dialogue and respect the free exercise of unions' rights within the context of local laws and regulations'. However, given that</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>the commitment to these last two is made 'within the context of local laws', it is not clear whether it is committed to respect these rights in all contexts and locations (i.e. alternative mechanisms for those countries where there are legal restrictions to the exercise of these rights). The Company also mentions International labour Organisation conventions, including '87 and 98 (freedom of association, protection of the right to organize and collective bargaining)'. However, the Company's wording in relation to this is that it 'aims to respect' this international reference, which is not considered a formal statement of commitment according to CHRB wording criteria. Additionally, the Company has provided comments to CHRB regarding this indicator. However, this document or its content has not been found in publicly available sources. [Code of Ethics, 2019: <a href="http://keringcorporate.dam.kering.com">keringcorporate.dam.kering.com</a>]</p> <ul style="list-style-type: none"> <li>• Met: Respect H&amp;S of workers: The Company states 'We provide a working environment that respects human rights and labor laws, and complies with laws and regulations on the environment, health and safety in all the countries in which we operate.' [Code of Ethics, 2019: <a href="http://keringcorporate.dam.kering.com">keringcorporate.dam.kering.com</a>]</li> <li>• Met: H&amp;S applies to AP suppliers: In its 2019 Code of Ethics the Company has a 'Group Suppliers' Charter' where it states that suppliers must 'prohibit any type of work which, by its nature or the conditions in which it is carried out, is likely to compromise health, safety, integrity or morality (clean and safe premises, access to drinking water, sanitary facilities, etc.);' [Code of Ethics, 2019: <a href="http://keringcorporate.dam.kering.com">keringcorporate.dam.kering.com</a>]</li> <li>• Not met: working hours for workers: The Code of Ethics states 'To ensure that our employees maintain a good balance between their working lives and personal lives, and to promote the well-being of each individual at work, Kering seeks to facilitate a supportive working environment which is caring and productive. For this purpose, the Group implements policies and mechanisms to facilitate each individual's daily life, and improve the quality of life at work: remote working, parental leave, portal solution for best managing the work-life balance, psychological support service, wellness days, etc.'. However, this is no evidence that the Company commits itself to respecting the ILO conventions on labour standards on working hours, or clarifying standard weekly hours, maximum working hours and minimum breaks. [Code of Ethics, 2019: <a href="http://keringcorporate.dam.kering.com">keringcorporate.dam.kering.com</a>]</li> <li>• Met: Working hours for AP suppliers: The suppliers' charter, included in the code of ethics, prohibits 'any behavior contrary to dignity and well-being at work, especially any practice contrary to labor regulations and in particular concerning remuneration and the right to a living wage, working hours (maximum working hours, breaks and rest periods) and working conditions'. The sustainability principles for suppliers state that 'a standard working week, except for overtime work, must be established by law; nevertheless, it should not exceed 48 hours per week'. Employees must get at least one off day after six consecutive working days'. '[...] overtime must be voluntary and must not exceed 12 hours per week, or be required on a regular basis'. [Code of Ethics, 2019: <a href="http://keringcorporate.dam.kering.com">keringcorporate.dam.kering.com</a> &amp; Sustainability Principles, N/A: <a href="http://keringcorporate.dam.kering.com">keringcorporate.dam.kering.com</a>]</li> </ul>
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"> <li>• Met: Regular stakeholder engagement: The Company reports engagement with worker unions in Europe. Also the Company carries out employee surveys 'intended for all employees at Kering and all of its Houses. An open - ended question about quality of life at work allows employees to identify their priorities and make suggestions in this area'. [2019 Universal Registration Document, 2020: <a href="http://keringcorporate.dam.kering.com">keringcorporate.dam.kering.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Commits to engage stakeholders in design: In its 2019 Reference Document under the heading 'Human rights and fundamental freedoms' the Company states 'As a sustainable, responsible Luxury Group, Kering must identify and manage human rights- related risks in its sphere of influence (operations and supply chain) as quickly and firmly as possible. By working in partnership with its suppliers and stakeholders and sharing best practices, Kering protects the reputation of the Group and its Houses and maintains the appeal of their creations.' However, no statement of commitment found to engage with affected stakeholders and/or their legitimate representatives in the development or monitoring of the human rights approach. [2019 Universal Registration Document, 2020: <a href="http://keringcorporate.dam.kering.com">keringcorporate.dam.kering.com</a>]</li> <li>• Not met: Regular stakeholder design engagement: See above. In addition, the Company reports stakeholder engagement including a number of organisations such as Sustainable Apparel Coalition, Textile Exchange, Business for Social Responsibility, etc. However, no evidence found of regular engagement with</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			affected stakeholders in the development or monitoring of human rights approach (workers, their families, workers in supply chain, local communities, representatives, etc.). The Company has provided comments to CHRB regarding this indicator. However, this evidence had already been taken into account in this indicator. [2019 Universal Registration Document, 2020: <a href="http://keringcorporate.dam.kering.com">keringcorporate.dam.kering.com</a> ]
A.1.5	Commitment to remedy	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"> <li>• Met: Commits to remedy: In its 2019 Code of Ethics the Company states that they 'undertake to prevent and penalize any breach of the Group's Code of ethics, and to put in place all the corrective and remedial actions necessary'. Code of ethics includes human rights commitments and supplier's charter. [Code of Ethics, 2019: <a href="http://keringcorporate.dam.kering.com">keringcorporate.dam.kering.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Not obstructing access to other remedies [Code of Ethics, 2019: <a href="http://keringcorporate.dam.kering.com">keringcorporate.dam.kering.com</a>]</li> <li>• Not met: Collaborating with other remedy initiatives: While the Company offers a variety of whistleblowing mechanisms, no evidence of collaboration with other remedy initiatives on human rights impacts was found. [Code of Ethics, 2019: <a href="http://keringcorporate.dam.kering.com">keringcorporate.dam.kering.com</a>]</li> <li>• Not met: Work with AP suppliers to remedy impacts: The Company indicates it performs audits of suppliers, which can lead to corrective action plans. However, no evidence could be found of the Company working with its suppliers to provide remedy to those affected by human rights impacts, either through the suppliers' own mechanisms or through the development of third party non-judicial remedies. [2019 Universal Registration Document, 2020: <a href="http://keringcorporate.dam.kering.com">keringcorporate.dam.kering.com</a>]</li> </ul>

## 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	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"> <li>• Met: Commits to ILO core conventions: See indicator A.1.2. The Company is committed to the UNGC.</li> <li>• Met: Senior responsibility for HR: The Company's 'Sustainability Department defines the Group's Sustainability Strategy and policies, and supports the Houses by operating as a resource platform and sounding board, with a view to setting out and building on the initiatives taken individually by each brand. More than 20 specialists, who report to the Chief Sustainability Officer and Head of International Institutional Affairs, a member of the Executive Committee, assist the Houses with the implementation of the Group's Sustainability Strategy by systematically looking for potential synergies and continuous improvement.' 'Risks relating to the categories included in the Non-Financial Information Statement as defined in Article L. 225 - 102 - 1 of the French Commercial Code – environment, social/societal, human rights, corruption and tax evasion – are accordingly an integral part of the Group's overall risk identification and management process, and as such are described in Chapter 6 of this Universal Registration Document. The Sustainability Department is involved in the process of identifying and classifying the risks that fall within its scope'. [2019 Universal Registration Document, 2020: <a href="http://keringcorporate.dam.kering.com">keringcorporate.dam.kering.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Day-to-day responsibility: See above. 'In addition, each House has at least one Sustainability Lead and for the larger Houses, entire Sustainability teams. As a result, Kering's Sustainability team numbers more than 60 people'. [2019 Universal Registration Document, 2020: <a href="http://keringcorporate.dam.kering.com">keringcorporate.dam.kering.com</a>]</li> <li>• Met: Day-to-day responsibility for AP in supply chain: The Company discloses in its Modern Slavery Statement that it has 'established a dedicated central body within the Group to control the compliance of Group suppliers. The process, known as the Hercules system, is based on six key pillars: [...] 2. CENTRALIZED MANAGEMENT Kering has centralized oversight through a team of 24 people (including twelve auditors specialized in conducting supplier audits and monitoring anomalies); depending on needs (locations, workload, etc.). This team can be assisted by an external service provider'. [2019 Modern Slavery Statement, 16/06/2020: <a href="http://keringcorporate.dam.kering.com">keringcorporate.dam.kering.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
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"> <li>• Met: Identifying risks in own operations: The Company indicates in Universal Registration Document that in 2014, called on the expertise of Business for Social Responsibility to update materiality analysis. There were 12 interviews internally and sent a questionnaire to over 100 external stakeholders (including trade unions, suppliers, NGOs, etc.). This work was 'a defining part' of the Sustainability strategy. It also indicates that 'to identify the main human rights challenges [...] in 2017 Kering analyzed its practices by comparing them to the UN Guiding Principles on Business and Human Rights. This survey enabled Kering to identify specific points for progress'. 'The non - financial risk "Human rights and fundamental freedoms "was identified in the Group's overall risk analysis[.] [...] In addition, during the process of drawing up the Kering Standards and the risk map for the duty of care plan, an analysis of human rights conditions in countries from which materials are sourced was undertaken.' In addition, in its last Modern Slavery Statement, the Company reports: 'In 2017 Kering analysed its practices by comparing them to the United Nations Guiding Principles on Business and Human Rights. This assessment enabled Kering to identify specific points for progress in areas including public commitment and policy, scope of internal control procedures, grievance and remediation mechanisms, and external communications. Following on from this analysis, Kering took steps to comply with the requirements of French 'Devoir de Vigilance' legislation, and to identify and evaluate risks, especially as regards human rights'. [2019 Universal Registration Document, 2020: <a href="http://keringcorporate.dam.kering.com">keringcorporate.dam.kering.com</a> &amp; 2019 Modern Slavery Statement, 16/06/2020: <a href="http://keringcorporate.dam.kering.com">keringcorporate.dam.kering.com</a>]</li> <li>• Met: Identifying risks in AP suppliers: The Company started this process during 2017 and 'Kering first identified the inherent risks of its supply chain', starting with the raw materials purchase. It says that Given that Sport &amp; Lifestyle's segment entities have more experience confronting potential violations of the duty of care, it has decided 'to focus its initial risk mapping efforts on developing a vigilance plan for its Luxury brands during the first year of the Law's application'. In 2018 the Company's operations re-focused in luxury brands. [Reference document 2017, 2018: <a href="http://kering.com">kering.com</a> &amp; Reference Document 2018, 24/04/2019: <a href="http://keringcorporate.dam.kering.com">keringcorporate.dam.kering.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Ongoing global risk identification: The Company states in its 2017 Reference Document that 'The assessment of risks must be re-evaluated each year in light of potential changes to the Group's supply chain and to the relevant internal documents and literature.' Additionally, in its Universal Registration Document, it discloses that 'In 2020, Kering will be carrying out a Group - wide human rights impact study and will update the risk map of its duty of care plan accordingly.' [2019 Universal Registration Document, 2020: <a href="http://keringcorporate.dam.kering.com">keringcorporate.dam.kering.com</a> &amp; Reference document 2017, 2018: <a href="http://kering.com">kering.com</a>]</li> <li>• Not met: In consultation with stakeholders: Although the Company indicates that it consulted with stakeholders in the materiality analysis, this took place in 2014. No evidence found of affected stakeholder consultation as part of the human rights risk identification process. [2019 Universal Registration Document, 2020: <a href="http://keringcorporate.dam.kering.com">keringcorporate.dam.kering.com</a>]</li> <li>• Not met: In consultation with HR experts</li> <li>• Met: Triggered by new circumstances: The Company indicates in Reference document 2017 that 'assessment of risks must be re-evaluated each year in light of potential changes to the Group's supply chain and to the relevant internal documents and literature'. In this context it is being considered that the mapping process involves both identification and assessment of risks. [Reference document 2017, 2018: <a href="http://kering.com">kering.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
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"> <li>• Met: Salient risk assessment (and context): 'The risk map covering Kering and its value chain was carried out in 2017 across the Luxury business, under supervision by a Group coordination committee'. 'This map drew a distinction between: a) intrinsic risks (existing in the absence of checks or attenuating factors set up by the Company), whether generic or specific; b) residual risks (remaining after mitigating measures are applied).' The Company 'collected information for all raw materials used in its luxury product manufacturing processes. These raw materials were grouped into various categories according to type. Kering deliberately took into account an extended list, including all agricultural, mining and extraction resources. The risk map differentiates between the different types of risks arising from raw material supplies, production and processing, and working conditions, factoring in the countries in which these operations take place'. [2019 Universal Registration Document, 2020: <a href="http://keringcorporate.dam.kering.com">keringcorporate.dam.kering.com</a>]</li> <li>• Not met: Public disclosure of salient risks: The Company discloses the following: 'In line with the undertakings set out in its Code of Ethics, Kering's duty of care plan targets risks of severe impacts on human rights and fundamental freedoms, human health and safety, and the environment, with particular regard to the following: a) human rights and fundamental freedoms: child labor, forced labor, wages, working hours, discrimination, freedom of association and collective bargaining, rights of local populations, working conditions, especially for vulnerable populations such as migrants, working conditions for fashion models, harassment, and sourcing conditions for certain stones and minerals; b) human health and safety: health and safety at work, consumers' health and safety'. However, it is unclear which of these risks are considered salient for itself as consequence of assessment, or just the issues considered material for the industry/duty of care. [2019 Universal Registration Document, 2020: <a href="http://keringcorporate.dam.kering.com">keringcorporate.dam.kering.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> </ul>
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"> <li>• Not met: Action Plans to mitigate risks: The Company indicates in the 2017 Reference document that it has adopted an action plan for 2018 which proposes four items to mitigate risks from suppliers. It includes the code of ethics, the compliance manual (will set out definitions, practical case studies and recommendations to guide employee behaviour and to ensure their understanding of the possible violations, being one of them human rights), the alert system to report potential misconducts, and a management system created in 2015 which purpose is to create best practices, monitor risk assessments and provide supply chain analysis for Luxury activities. In 2018 Reference document it describes these tools and provides a number of indicators used to monitor group operations and supply chain. However, these describe practices to monitor compliance, rather than having systems to take action to prevent, mitigate or remediate different specific risks that are salient to the Company. In the Universal Registration Document from 2019, nothing further related to this could be found. [Reference document 2017, 2018: <a href="http://kering.com">kering.com</a> &amp; Reference Document 2018, 24/04/2019: <a href="http://keringcorporate.dam.kering.com">keringcorporate.dam.kering.com</a>]</li> <li>• Not met: Including in AP supply chain: The Company has provided comments to CHRB regarding this indicator. However, evidence was not material. It seems to refer to compliance monitoring rather than risk mitigation.</li> <li>• Met: Example of Actions decided: Bottega Veneta 'runs an ambitious pilot project on equal access to career opportunities for women in the Italian luxury sector working together with 'Camera Nazionale della Moda Italiana'. In 2018 Kering carried out a risk and opportunity assessment on gender in supply chains, culminating in a ranking for actions in Italy. In particular, this work highlighted poor visibility on working conditions for women in luxury supply chains in Italy and came up with several ideas for remedial action. The plan for 2019 involves a data collection operation through surveys addressing a broad public, site visits, and working groups spanning employees, management teams and unions. This will be backed by regular communication campaigns throughout the project, to achieve wide exposure for key findings'. [Reference Document 2018, 24/04/2019: <a href="http://keringcorporate.dam.kering.com">keringcorporate.dam.kering.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
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"> <li>Not met: System to check if Actions are effective: Although the Company describes its systems and tools, and how it monitors compliance and follows up different indicators, it seems to be related to compliance monitoring rather evaluating effectiveness of different actions taken to tackle different issues, which is what this indicator looks for. [2019 Universal Registration Document, 2020: <a href="http://keringcorporate.dam.kering.com">keringcorporate.dam.kering.com</a>]</li> <li>Not met: Lessons learnt from checking effectiveness</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Not met: Both requirement under score 1 met</li> </ul>
B.2.5	Communicating : Accounting for how human rights impacts are addressed	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>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.</li> <li>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</li> <li>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</li> <li>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</li> <li>Not met: Including AP 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</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Not met: Responding to affected stakeholders concerns: The Company reports a case of a jumper that caused offense, and how it decided to remove it from stores. Also it provides evidence of a community fund and scholarship program for North America Alongside Global Volunteering program. However, this does not seem to be related with human rights of affected stakeholders being impacted, as it seems to be considered a reaction of offense from the public due to a controversial product. [Twitter - Communication from Gucci over a product, 06/02/2019: <a href="https://twitter.com">twitter.com</a> &amp; Gucci Changemakers, 18/03/2019: <a href="http://equilibrium.gucci.com">equilibrium.gucci.com</a>]</li> <li>Not met: Ensuring affected stakeholders can access communications</li> </ul>

## Remedies and Grievance Mechanisms

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.1	Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers	1.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Met: Channel accessible to all workers: The code of ethics indicates that 'any employee may also choose to make direct contact with the worldwide Ethics hotline, set up to register and record issues referred to them and to pass them on to the Ethics Committee(s) concerned'. The hotline is available to all worldwide. [Code of Ethics, 2019: <a href="http://keringcorporate.dam.kering.com">keringcorporate.dam.kering.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Not met: Number grievances filed, addressed or resolved: The Company indicates that they received 55 complaints in 2019, 69% HR/ Management issues and 13% Alignment with local regulations (overtime, contract termination, etc.), however, it is unclear how many complaints have to do specifically with human rights, and which of them were addressed or resolved. [2019 Universal Registration Document, 2020: <a href="http://keringcorporate.dam.kering.com">keringcorporate.dam.kering.com</a>]</li> <li>Not met: Channel is available in all appropriate languages: This hotline handles calls from employees 'which is free and accessible to everyone, in the most spoken languages of the Group'. However, it is not clear if it is available in all appropriate languages, since it is said 'in the most spoken languages of the group'. [Code of Ethics, 2019: <a href="http://keringcorporate.dam.kering.com">keringcorporate.dam.kering.com</a>]</li> <li>Met: Opens own system to AP supplier workers: Since January 2018, the hotline is open to 'external and temporary staff working for external partners or service providers under contract with the Group and/or its Houses. Issues may be reported directly or by means of an external ethics hotline.' [2019 Universal Registration Document, 2020: <a href="http://keringcorporate.dam.kering.com">keringcorporate.dam.kering.com</a>]</li> </ul>
C.2	Grievance channel(s)/mechanism(s) to receive	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Met: Grievance mechanism for community: The hotline is available to anyone: 'In parallel with the Ethics Committees and the Compliance Organization, any person</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
	complaints or concerns from external individuals and communities		<p>may also choose to make direct contact with the global Ethics hotline set up to register and record issues referred to it, and to pass them on to the Ethics Committee(s) concerned and the Compliance Organization, via persons identified and authorized to guarantee the confidentiality and security of the information received.' [Code of Ethics, 2019: <a href="http://keringcorporate.dam.kering.com">keringcorporate.dam.kering.com</a>]</p> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Describes accessibility and local languages: The Company describe internet access, telephone access and language availability ('worldwide hotline which is free and accessible to everyone, in the most spoken languages of the Group'). It is not clear, however, if it is available in all relevant languages, including those of local communities, since it is said 'in the most spoken languages of the Group. [Code of Ethics, 2019: <a href="http://keringcorporate.dam.kering.com">keringcorporate.dam.kering.com</a>]</li> <li>• Not met: Expects AP supplier to have community grievance systems</li> <li>• Not met: AP supplier communities use global system</li> </ul>
C.7	Remedying adverse impacts and incorporating lessons learned	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"> <li>• Met: Describes how remedy has been provided: In relation to remediation provided, it gives the example of a zero-tolerance breach from a supplier: 'This supplier had made accommodation available to its employees without a lease. In accordance with the procedure in place for this type of anomaly, a crisis unit was immediately set up with the relevant House. After analyzing the case, the supplier corrected the situation by providing proof that leases had been established'. In its 2019 Universal Registration Document, the Company discloses another case: 'One example of remediation concerned a case of social dumping – a zero - tolerance breach under the Kering classification – identified at a supplier of one of the Group's Houses in 2019. The Company had applied a contract containing exceptions to the minimum wages set down in the Italian collective bargaining agreement (CCNL Tessili Moda Industria). The collaboration set up between the central audit team, the relevant House and the supplier to deal with this case resulted in the scheduling of a new audit to ensure that the situation had been rectified: the follow - up audit showed that the supplier now applies the Italian collective bargaining agreement, with the statutory minimum wages' [Reference Document 2018, 24/04/2019: <a href="http://keringcorporate.dam.kering.com">keringcorporate.dam.kering.com</a> &amp; 2019 Universal Registration Document, 2020: <a href="http://keringcorporate.dam.kering.com">keringcorporate.dam.kering.com</a>]</li> <li>• Not met: Says how it would remedy key sector risks</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Changes introduced to stop repetition</li> <li>• Not met: Approach to learning from incident to prevent future impacts</li> <li>• Not met: Evaluation of the channel/mechanism</li> </ul>

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
E(1).0	Serious allegation No 1		<ul style="list-style-type: none"> <li>• Headline: Kering investigated by 'France 2' over labour abuse in its leather suppliers factories in Italy</li> <li>• Area: Working Hours, H&amp;S</li> <li>• Story: On October 9, 2018, journalist Elise Lucet investigated the world of luxury brands on her program titled "Cash Investigation: Luxe, les Dessous Chocs." The investigation highlighted the difficult working conditions in Italian leather factories. In the documentary, Chanel, Yves Saint Laurent, and Louis Vuitton were all implicated in their suppliers' poor labor rights practices. According to the allegations, two Senegalese workers were "hit with iron bars" for simply claiming their salary from their boss. Lucet also announced to have accumulated several testimonies mentioning the 13-hour workdays, unpaid work, unpaid overtime, and precarious working contracts for persons of color. Security systems were also removed on machines to avoid slowing down production. Additionally, an employee testified to having lost three fingers due to the dangerous working conditions.</li> <li>• Sources: [France TV Info - 20/09/2018: <a href="http://francetelevisions.fr">francetelevisions.fr</a>]</li> </ul>
E(1).1	The Company has responded publicly to the allegation	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"> <li>• Not met: Public response available: Kering SA has not responded publicly to the allegation</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Response goes into detail: Kering SA has not responded publicly to the allegation</li> </ul>



Indicator Code	Indicator name	Score (out of 2)	Explanation
E(1).2	The Company has appropriate policies in place	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"> <li>• Met: Company policies address the general issues raised: Kering SA's (Kering) Code of Ethics states that "Kering does not tolerate any sort of harassment, discrimination, intimidation, bullying or humiliating behavior, whether psychological, sexual or constituting an abuse of power. It is the responsibility of every individual not to behave in a way that could harm the dignity and rights of others. Harassment means any repetitive voluntary pattern of hostile, abusive or humiliating behavior, whether in the form of verbal comments, actions or gestures which jeopardize the dignity or psychological well-being of a person and which cause a deterioration of the working environment. It may take multiple forms (degrading, offensive obscene comments, rumor or ridicule, threats, requests to perform demeaning tasks, excluding and isolating people, etc.)." [Code of Ethics, 2019: <a href="http://keringcorporate.dam.kering.com">keringcorporate.dam.kering.com</a>]</li> <li>• Met: Policies apply to the type of business relationships involved: Kering SA's (Kering) Code of Ethics contains a suppliers code of conduct, which states that it prohibits "any behavior contrary to dignity and well-being at work, especially any practice contrary to labor regulations and in particular concerning remuneration and the right to a living wage, working hours (maximum working hours, breaks and rest periods) and working conditions." [Code of Ethics, 2019: <a href="http://keringcorporate.dam.kering.com">keringcorporate.dam.kering.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Policies address the specific rights in question: The Sustainability principles, which 'all of Kering and its brands' suppliers are required to comply', include requirements and guidelines on working hours: 'working hours must comply with national laws, collective agreements, and international conventions'. A standard working week should not exceed 48 hours. Employees must get at least one off day after six consecutive working days, all overtime shall be voluntary, not be used to replace regular employment, and compensated at a premium rate, etc. [Code of Ethics, 2019: <a href="http://keringcorporate.dam.kering.com">keringcorporate.dam.kering.com</a> &amp; Sustainability Principles, N/A: <a href="http://keringcorporate.dam.kering.com">keringcorporate.dam.kering.com</a>]</li> </ul>
E(1).3	The Company has taken appropriate action	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"> <li>• Not met: Engages with affected stakeholders: Kering SA (Kering) has not engaged with the affected stakeholders.</li> <li>• Not met: Encourages linked business to engage affected stakeholders: Kering SA (Kering) has not encouraged linked businesses to engage.</li> <li>• Not met: Provides remedies to affected stakeholders: Kering SA (Kering) has not provided remedies to the affected stakeholders.</li> <li>• Not met: Has reviewed management systems to prevent recurrence: Kering SA has not reviewed its management systems to response to the allegation.</li> </ul> <p>Score 2</p>

## 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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