

Company Name Kerry Group
Industry Agricultural Products (Supply Chain only)
UNGP Core Score (*) 15.0 out of 26

Score	Out of	For indicators
Governance and Policy Commitments		
2	2	A.1.1 Commitment to respect human rights
2	2	A.1.2 Commitment to respect the human rights of workers
1	2	A.1.4 Commitment to engage with stakeholders
1.5	2	A.1.5 Commitment to remedy
Embedding respect and Human Rights Due Diligence		
Embedding respect		
2	2	B.1.1 Embedding - Responsibility and resources for day-to-day human rights functions
Human Rights Due Diligence (HRDD)		
0.5	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	2	B.2.5 HRDD - Reporting: Accounting for how human rights impacts are addressed
Remedies and Grievance Mechanisms		
1.5	2	C.1 Grievance channels/mechanisms to receive complaints or concerns from workers
2	2	C.2 Grievance channels/mechanisms to receive complaints or concerns from external individuals and communities
0.5	2	C.7 Remedying adverse impacts and incorporating lessons learned
15.0	26	

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

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

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

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

Detailed assessment

Governance and Policies

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1.1	Commitment to respect human rights	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: General HRs commitment: In its Human Rights Policy, the Company states that it 'respects internationally recognised Human Rights as established in the Universal Declaration on Human Rights and the International Labour Organisation's Core Conventions.' [Human Rights Policy, 03/2017: kerrygroup.com] • Met: UDHR: See above <p>Score 2</p> <ul style="list-style-type: none"> • Met: UNGPs: The Company, in line with the UN Guiding Principles on Business and Human Rights, 'recognises the corporate responsibility to respect these principles and commit to 'know and show' this through on-going human rights due diligence.' [Human Rights Policy, 03/2017: kerrygroup.com]
A.1.2	Commitment to respect the human rights of workers	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: ILO Core: The Company commits to respecting the International Labour Organisation's Core Conventions, as stated in the Code of Conduct. The Human rights policy states that 'Kerry respects internationally recognised Human Rights as established in the Universal Declaration on Human Rights and the International Labour Organisation's Core Conventions'. [Group Code of Conduct, 10/04/2018: kerrygroup.com] • Met: Explicitly list All four ILO for AG suppliers: The Company states that its suppliers 'shall not permit the use of child labour', 'shall not permit the use of forced or involuntary labour of any type', 'shall not discriminate in hiring, compensation, access to training, promotion, termination or retirement' on many aspects (e.g. race, caste, religion, age...) and 'shall respect the rights of employees to organise and join, or refrain from joining, worker organisations and to bargain collectively [...] In the absence of legal protections for the right to collective bargaining or freedom of associations, suppliers will seek to engage workers through alternative lawful mechanisms that allow worker representation on workplace issues'. [Supplier Code of Conduct, 26/06/2020: kerrygroup.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Explicit commitment to All four ILO Core: The Company states it does 'not use child or forced labour in any of [its] operations or facilities,' referencing the ILO core relating to child labour and forced labour. It also mentions Freedom of Association and Collective Bargaining, stating they believe 'in the rights of workers to associate freely and bargain collectively.' They also have a non-discrimination policy. [Group Code of Conduct, 10/04/2018: kerrygroup.com] • Met: Respect H&S of workers: The Company's 'executive management is committed to a healthy and safe workplace.' [Group Code of Conduct, 10/04/2018: kerrygroup.com] • Met: H&S applies to AG suppliers: The Company's suppliers 'shall ensure all employees work within safe and humane conditions.' [Supplier Code of Conduct, 26/06/2020: kerrygroup.com]
A.1.4	Commitment to engage with stakeholders	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Commits to stakeholder engagement: The Company states in the annual report that 'Kerry is committed to ongoing and constructive engagement with our stakeholders and through a two-way engagement process, we incorporate their views into our business activities' [...] 'Among our key stakeholders are employees, shareholders, communities, customers, consumers, government and suppliers.' [2019 Annual Report, 2020: kerrygroup.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Commits to engage stakeholders in design: The Company discloses that 'We are committed to the highest standards of business and ethical behaviour, to

Indicator Code	Indicator name	Score (out of 2)	Explanation
			fulfilling our responsibilities to the communities which we serve and to the creation of long term value for all stakeholders on a socially and environmentally sustainable basis.' It also indicates: 'we engage our key stakeholder groups and relevant third parties to help achieve our broader goals'. On its Human Rights Statement, the Company indicates: 'The role of the working group is to continually develop, articulate and integrate our overall approach to human rights, building on the work to date and driving greater awareness and engagement with key stakeholders to ensure our commitments are upheld'. However, no evidence found in relation to commitment to engagement with affected stakeholders in the development or monitoring of the human rights approach. [2019 Annual Report, 2020: kerrygroup.com & Human Rights Statement, 06/2020: kerrygroup.com] • Not met: Regular stakeholder design engagement
A.1.5	Commitment to remedy	1.5	The individual elements of the assessment are met or not as follows: Score 1 • Met: Commits to remedy: The Company indicates: 'we engage directly where potential human rights impacts have been highlighted and seek to understand the causes and remedy required in any given situation'. It also states: 'We are committed to creating effective grievance mechanisms and addressing and remedying adverse human rights impacts'. [Human Rights Statement, 06/2020: kerrygroup.com] Score 2 • Met: Not obstructing access to other remedies: The Company indicates: 'We will not obstruct access to remedy and are open to collaborate on initiatives that provide such access'. [Human Rights Statement, 06/2020: kerrygroup.com] • Not met: Work with AG suppliers to remedy impacts: The Company indicates: 'Where suppliers fail to adequately engage or take the necessary steps to remedy the issues identified, we will take action up to and including termination of the business relationship'. The supplier code also requires to have processes and systems in place for reporting concerns. However, it is not clear how the Company is committed to work with its suppliers to remedy adverse impacts, through the business relationships' own mechanisms or through collaborating with them in the development of third party non-judicial remedies. [Human Rights Statement, 06/2020: kerrygroup.com & Supplier Code of Conduct, 26/06/2020: kerrygroup.com]

Embedding Respect and Human Rights Due Diligence

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.1	Responsibility and resources for day-to-day human rights functions	2	The individual elements of the assessment are met or not as follows: Score 1 • Met: Commits to ILO core conventions: See indicator A.1.2. The Company is committed to ILO conventions. • Met: Senior responsibility for HR: The 'Towards 2020' programme outlines many sustainable practices, including human rights in the workplace. This programme is governed by the Sustainability Council, which is chaired by a Senior member of the executive committee, and includes leadership from other parts of the Company, who implement the programme within their respective areas. [Annual Report 2018, 2018: kerrygroup.com] Score 2 • Met: Day-to-day responsibility: The Company indicates: '[...] this working group includes senior personnel from the Human Resource, Procurement, Supply Quality and Sustainability functions who have day to day responsibility for delivering on the Group's human rights commitments across our operations and broader value chain' and 'On a day-to-day basis, the Group's Chief Human Resource Officer and our Human Resource function has a key role in ensuring rights are upheld internally and all functions and management have a part to play'. [Human Rights Statement, 06/2020: kerrygroup.com] • Met: Day-to-day responsibility for AG in supply chain: The Company indicates: 'Our Chief Procurement Officer, the procurement function and supply quality team have the key day-to-day responsibility for ensuring that appropriate processes and controls are in place to ensure our human rights requirements are observed by suppliers'. [Human Rights Statement, 06/2020: kerrygroup.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.1	Identifying: Processes and triggers for identifying human rights risks and impacts	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Identifying risks in own operations: The Company describes a process and indicates: 'It is during this detailed process that risks linked to human rights are highlighted and considered within the wider risk assessment process. While human rights as a whole have not been identified as a principal risk for the group to date, one of our key salient issues, health and safety, has been included within the Group's Risk section on its Annual Report, in 2019'. It also refers to the potential risk of human rights infringement and states: 'To ensure we address the most critical points, we adopt a risk-based approach to monitoring that ensures that we take an end to end view, focusing on commodities and/or geographies where there is a greater potential for infringement'. However, no description found of a process to identify its human rights risks and impacts, covering its own operations and also evidence that the company carries out an assessment when something new happens that could potentially affect its impact and risk. [Human Rights Statement, 06/2020: kerrygroup.com] • Met: Identifying risks in AG suppliers: The Company indicates: 'Within our supply chain, we have mapped key human rights risks using a range of external data and benchmark tools as part of the broader responsible sourcing criteria. We undertake a thorough country and commodity risk assessment and through this risk mapping process, we assess both the risks associated with the sites of production and the agricultural origin of key commodities, where these are different'. [Human Rights Statement, 06/2020: kerrygroup.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Ongoing global risk identification • Not met: In consultation with stakeholders: The Company indicates: 'We have well defined engagements that help us to incorporate the views of rights holders into our business activities', in the context of addressing human rights issues. However, no details found of actual consultation with affected or potentially affected stakeholders to identify potential human rights risks and impacts. [Human Rights Policy, 03/2017: kerrygroup.com] • Not met: In consultation with HR experts: The Company indicates: 'In recognising our need to build on our knowledge in this evolving area, we are working to further engage with experts. In 2020, we have held discussions with both organisations and individuals with significant expertise as we seek to build on our work to date and will continue to do so as we evolve our approach'. However, no details found of actual consultation with specific internal or external human rights experts in human rights risks and impacts identification. [Human Rights Policy, 03/2017: kerrygroup.com] • Not met: Triggered by new circumstances • Not met: Explains use of HRIAs or ESIA (inc HR)
B.2.2	Assessing: Assessment of risks and impacts identified (salient risks and key industry risks)	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Salient risk assessment (and context): The Company indicates: 'As part of our continued risk assessment approach, we have initiated an assessment of salient human rights issues across our business. These are issues that stand out because of their significant potential impact through our activities across our operations and supply chain' and 'Our salient issues have been determined by examining key areas of impact and influence across our value chain and with reference to stakeholder and expert groups'. However, no details found in relation to factor(s) taken into account in saliency assessment, such as geographical, social, economic and/or others. [Human Rights Statement, 06/2020: kerrygroup.com] • Met: Public disclosure of salient risks: The Company indicates: 'As part of our continued risk assessment approach, we have initiated an assessment of salient human rights issues across our business. These are issues that stand out because of their significant potential impact through our activities across our operations and supply chain. Through a preliminary assessment we have identified the following salient issues for our business: Health and safety, freedom of association and collective bargaining, discrimination, working hours, forced labour, child labour, fair wages'. [Human Rights Statement, 06/2020: kerrygroup.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.3	Integrating and Acting: Integrating assessment findings internally and taking appropriate action	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Action Plans to mitigate risks: The Company states: 'This builds on existing training programmes incorporating human rights, which are undertaken where we have a direct relationship with suppliers either via contractual relationships (e.g. Dairy) or through dedicated responsible sourcing programmes at farm level (e.g. Palm oil, vanilla). Through these programmes we work with supply partners and aim to address multiple sustainability risks by tackling some of the key underlying issues'. It also indicates: 'Internal assessments and audit findings are reviewed by site management and regional teams and required actions are completed with the support of relevant functions'. However, no details found in relation to systematic risk-based approach to mitigate the different salient issues. Evidence seems to refer to specific supplier approach. [Human Rights Statement, 06/2020: kerrygroup.com] • Not met: Including in AG supply chain: See above • Met: Example of Actions decided: In the context of vanilla supply chain in Madagascar, where there is a labour intense sector and very low income, the Company is working to improve lives of farmers and families. Along with its supplier in Madagascar, they 'have set up the 'Tsara Kalitao' Project, which translates as 'Good Quality' in Malagasy. At its core it focuses on training farmers to produce better quality vanilla beans and increase their income. However, the broader programme is designed to support the sustainable development of the region. It does this through three elements; Farmer Income, Empowering Women and Education.' [Tsara Kalitao, N/A: kerrygroup.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met
B.2.4	Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: System to check if Actions are effective: The Company indicates: 'Following the establishment of the human rights working group this year, this team has begun to assess how the current process of monitoring, assessment and communication can be enhanced. In particular, we are seeking to ensure the effectiveness of our actions through supporting a globally integrated approach, where risks and opportunities in different locations can be communicated more widely within the organisation and across our supply chain to promote shared learnings and ongoing improvements'. However, it is not yet clear how the system for tracking the actions taken in response to human rights risks and impacts assessed and for evaluating whether the effectiveness operates. [Human Rights Statement, 06/2020: kerrygroup.com] • Not met: Lessons learnt from checking effectiveness <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirement under score 1 met
B.2.5	Communicating : Accounting for how human rights impacts are addressed	0	<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: Comms plan re identifying risks: In order to be awarded this indicator, the Company needs to achieve at least 1,5 points in B.2.1 • Not met: Comms plan re assessing risks: In order to be awarded this indicator, the Company has to achieve a full score in B.2.2 • Not met: Comms plan re action plans for risks: In order to be awarded this indicator, the Company has to achieve a full score in B.2.3 • Not met: Comms plan re reviewing action plans: In order to be awarded this indicator, the Company has to achieve a full score in B.2.4 • Not met: Including AG suppliers: In order to be awarded this indicator, the Company has to achieve a full score in B.2.2/B.2.3/B.2.4 and at least 1,5 points in B.2.1 <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Responding to affected stakeholders concerns: The Company has provided comments to CHRB regarding this indicator. However, evidence was not material. This indicator looks for evidence of how the company, in terms of communication, has responded to specific concerns raised by affected stakeholders. • Not met: Ensuring affected stakeholders can access communications

Remedies and Grievance Mechanisms

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.1	Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers	1.5	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 Company uses the platform EthicsPoint (both online and telephone) as an alternative to speaking with the 'manager/supervisor, Human Resources or Internal Audit,' which are the other options to report concerns. In the countries where 'privacy laws limit use of this hotline to concerns related to finance, auditing, accounting, banking and anti-bribery matters,' it is recommended to contact one of the aforementioned people. [EthicsPoint, N/A: secure.ethicspoint.com] Score 2 <ul style="list-style-type: none"> Not met: Number grievances filed, addressed or resolved: The Company reports in relation to reported issues during the last period. However, it is not clear the total number of grievances related to human rights that were filed and either addressed or resolved. [2019 Annual Report, 2020: kerrygroup.com] Met: Channel is available in all appropriate languages: The Hotline is available 'in more than 100 languages, 24 hours a day, 7 days a week.' [EthicsPoint, N/A: secure.ethicspoint.com] Met: Opens own system to AG supplier workers: The 'independent ethics hotline is also available to our suppliers and their workers.' [Slavery Statement, 28/06/2019: kerrygroup.com]
C.2	Grievance channel(s)/mechanism(s) to receive complaints or concerns from external individuals and communities	2	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Met: Grievance mechanism for community: The EthicsPoint website is available to any person, in or outside of the Company. [EthicsPoint, N/A: secure.ethicspoint.com] Score 2 <ul style="list-style-type: none"> Met: Describes accessibility and local languages: As stated in C.1, the Hotline is available in over 100 languages, 24 hours a day and 7 days a week, and is an online service available from anywhere. [EthicsPoint, N/A: secure.ethicspoint.com] Met: AG supplier communities use global system: The mechanism is available to anyone and is an online service. [Slavery Statement, 28/06/2019: kerrygroup.com & EthicsPoint, N/A: secure.ethicspoint.com]
C.7	Remedying adverse impacts and incorporating lessons learned	0.5	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 Met: Evaluation of the channel/mechanism: The Company indicates: 'In 2019, the Audit Committee reviewed the whistleblowing incidents and outcomes and provided updates to the Board which enabled the Board to assess the adequacy of the whistleblowing arrangements and to review the reports arising from its operation. The Board is satisfied that the Group's whistleblowing arrangements are operating effectively'. [2019 Annual Report, 2020: kerrygroup.com]

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

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

Disclaimer

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

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

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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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