

**Company Name** LPP  
**Industry** Apparel (Supply Chain only)  
**UNGP Core Score (\*)** 1.5 out of 26

Score	Out of	For indicators
<b>Governance and Policy Commitments</b>		
0	2	A.1.1 Commitment to respect human rights
0.5	2	A.1.2 Commitment to respect the human rights of workers
0	2	A.1.4 Commitment to engage with stakeholders
0	2	A.1.5 Commitment to remedy
<b>Embedding respect and Human Rights Due Diligence</b>		
Embedding respect		
0	2	B.1.1 Embedding - Responsibility and resources for day-to-day human rights functions
Human Rights Due Diligence (HRDD)		
0	2	B.2.1 HRDD - Identifying: Processes and triggers for identifying human rights risks and impacts
0	2	B.2.2 HRDD - Assessing: Assessment of risks and impacts identified (salient risks and key industry risks)
0	2	B.2.3 HRDD - Integrating and Acting: Integrating assessment findings internally and taking appropriate action
0	2	B.2.4 HRDD - Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts
0	2	B.2.5 HRDD - Reporting: Accounting for how human rights impacts are addressed
<b>Remedies and Grievance Mechanisms</b>		
1	2	C.1 Grievance channels/mechanisms to receive complaints or concerns from workers
0	2	C.2 Grievance channels/mechanisms to receive complaints or concerns from external individuals and communities
0	2	C.7 Remedying adverse impacts and incorporating lessons learned
<b>1.5</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	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: General HRs commitment: The Company indicates: 'LPP's Supplier Code of Conduct details the requirements that our vendors must meet as regards workplace conditions. The document is the basic tool by which we promote LPP's values and standards among the vendors. It restates the International Labour Organisation conventions and the Universal Declaration of Human Rights.' However, it does indicate a formal commitment to Human Rights from the Company. [Modern Slavery Statement, 2018: <a href="https://lppsa.com">lppsa.com</a>]</li> <li>• Not met: UNGC principles 1 &amp; 2</li> <li>• Not met: UDHR: See above.</li> <li>• Not met: International Bill of Rights</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: UNGPs</li> <li>• Not met: OECD: The Company only mentions the OECD when disclosing its attitude to tax planning. "In regards to international tax aspects, including cross border transactions, LPP UK seek in all circumstances to adhere to guidance Published by the Organization for Economic Co-operation and Development ('OECD') and HMRC. " [LPP Reserved UK Limited's tax strategy, 2017: <a href="https://lppsa.com">lppsa.com</a>]</li> </ul>
A.1.2	Commitment to respect the human rights of workers	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"> <li>• Not met: ILO Core: The Company indicates the adherence to ILO Conventions as a supplier requirement. However, there is no evidence of commitment to ILO Conventions in its own operations. [Code of Conduct, 2015: <a href="https://lppsa.com">lppsa.com</a>]</li> <li>• Not met: UNGC principles 3-6</li> <li>• Not met: Explicitly list ALL four ILO for AP suppliers: The Company discloses: 'LPP's Supplier Code of Conduct details the requirements that our vendors must meet as regards workplace conditions'. Also, it states: 'The employer shall respect the workers organizations' right to represent its members and seek collective dispute resolution as provided for by the International Labour Organization (ILO) definition and interpretations and applicable local laws'. However, this is not an explicit mention to collective bargaining, as required by the indicator. [Modern Slavery Statement, 2018: <a href="https://lppsa.com">lppsa.com</a> &amp; Code of Conduct, 2015: <a href="https://lppsa.com">lppsa.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 only commits to ILO Core values in a document directed to business partners. "The Code describes suppliers' obligations in the area of conditions of employment, including: compensation policies, prohibitions of child Labour and forced Labour, freedom of association and equal treatment of all employees." The Company also states health and safety of business partners' workers is to be respected. "Employee safety is of paramount and unimpeachable importance. Providing appropriate work conditions which ensure that employees are able to fulfil their responsibilities in a safe manner, that poses no risk to their health nor life, must be a priority for each supplier. All suppliers working in the LPP supply chain shall exercise the highest care for their employees' safety and provide appropriate and stable working conditions." [Code of Conduct, 2015: <a href="https://lppsa.com">lppsa.com</a>]</li> <li>• Not met: Respect H&amp;S of workers: See above. [Code of Conduct, 2015: <a href="https://lppsa.com">lppsa.com</a>]</li> <li>• Met: H&amp;S applies to AP suppliers: See above. [Code of Conduct, 2015: <a href="https://lppsa.com">lppsa.com</a>]</li> <li>• Not met: working hours for workers: See above. [Code of Conduct, 2015: <a href="https://lppsa.com">lppsa.com</a>]</li> <li>• Met: Working hours for AP suppliers: The Company explicitly expects its suppliers to respect their workers right to a weekly day off, freedom of movement and voluntary working hours: 'A standard weekly work schedule (not including overtime) shall adhere to the limitations provided for under local laws and shall not</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			exceed 48 hours. [...] Employees shall be granted at least one day off following six consecutive work days.' [Code of Conduct, 2015: <a href="https://lppsa.com">lppsa.com</a> ]
A.1.4	Commitment to engage with stakeholders	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Not met: Commits to stakeholder engagement: The Company discloses which communication channel is appropriate to each type of stakeholder. However, no evidence found of commit to engaging with them (affected stakeholders). [2019 Annual Integrated Report, 21.05.2020: <a href="https://lppsa.com">lppsa.com</a>]</li> <li>Not met: Regular stakeholder engagement</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Not met: Commits to engage stakeholders in design</li> <li>Not met: Regular stakeholder design engagement</li> </ul>
A.1.5	Commitment to remedy	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Not met: Commits to remedy</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Not met: Not obstructing access to other remedies</li> <li>Not met: Collaborating with other remedy initiatives</li> <li>Not met: Work with AP suppliers to remedy impacts</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	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Not met: Commits to ILO core conventions</li> <li>Not met: Senior responsibility for HR</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Not met: Day-to-day responsibility</li> <li>Not met: Day-to-day responsibility for AP in supply chain</li> </ul>
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"> <li>Not met: Identifying risks in own operations</li> <li>Not met: Identifying risks in AP suppliers</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Not met: Ongoing global risk identification</li> <li>Not met: In consultation with stakeholders</li> <li>Not met: In consultation with HR experts</li> <li>Not met: Triggered by new circumstances</li> </ul>
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"> <li>Not met: Salient risk assessment (and context): The Company indicates: 'we continually update our risk assessments. Detailed information about risks is provided in risk assessment cards for different groups of positions. In our assessment, the primary risk we face, and one that causes most accidents, is the movement of employees (transport). Both companies keep a central register of work accidents, which helps us manage situations involving job-related accidents and act to prevent them'. However, the Company does not describe its process(es) for assessing its potential human rights risks. [2019 Annual Integrated Report, 21.05.2020: <a href="https://lppsa.com">lppsa.com</a>]</li> <li>Not met: Public disclosure of salient risks: The Company integrates human rights risks in the risk management system as it considers there can be reputation damage due to outsourcing work to manufacturers in developing countries and mobbing. However, it is not clear which are the specific risks issues that are considered to be salient to it. [2019 Annual Integrated Report, 21.05.2020: <a href="https://lppsa.com">lppsa.com</a>]</li> </ul> Score 2 <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	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Not met: Action Plans to mitigate risks</li> <li>Not met: Including in AP supply chain</li> <li>Not met: Example of Actions decided</li> </ul> Score 2 <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</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	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Comms plan re identifying risks</li> <li>• Not met: Comms plan re assessing risks</li> <li>• Not met: Comms plan re action plans for risks</li> <li>• Not met: Comms plan re reviewing action plans</li> <li>• Not met: Including AP suppliers</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Responding to affected stakeholders concerns</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	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 Company indicates: 'One of the key things the workers learn about is a whistleblower system, a free helpline every worker may call to report a safety hazard in their factory' (workers including stores can report other topics). [2019 Annual Integrated Report, 21.05.2020: <a href="https://www.lppsa.com">lppsa.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Number grievances filed, addressed or resolved: The Company indicates: 'In the 2019/20 reporting year the ethics officers handled 19 reports, one case is in progress. Ten reports were actually inquiries about The LPP Principles. Two reports were not followed up because they did not include sufficient information and the ethics officers were unable to contact the anonymous whistleblowers'. However, the indicator requires the Company to disclose data about the practical operation of the mechanism, including the number of grievances about human rights issues filed, addressed or resolved. [2019 Annual Integrated Report, 21.05.2020: <a href="https://www.lppsa.com">lppsa.com</a>]</li> <li>• Not met: Channel is available in all appropriate languages</li> <li>• Not met: Expect AP supplier to have equivalent grievance systems</li> <li>• Not met: Opens own system to AP supplier workers</li> </ul>
C.2	Grievance channel(s)/mechanism(s) to receive complaints or concerns from external individuals and communities	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Grievance mechanism for community</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Describes accessibility and local languages</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	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Describes how remedy has been provided</li> <li>• Not met: Says how it would remedy key sector risks</li> </ul> Score 2 <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		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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