

Corporate Human Rights Benchmark 2020 Company Scoresheet

Company Name LVMH Moët Hennessy - Louis Vuitton
Industry Apparel (Supply Chain and Own Operations)
UNGP Core Score (*) 11.0 out of 26

| Score | Out of | For indicators |
|---|-----------|--|
| Governance and Policy Commitments | | |
| 2 | 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 |
| Embedding respect and Human Rights Due Diligence | | |
| Embedding respect | | |
| 1.5 | 2 | B.1.1 Embedding - Responsibility and resources for day-to-day human rights functions |
| Human Rights Due Diligence (HRDD) | | |
| 1.5 | 2 | B.2.1 HRDD - Identifying: Processes and triggers for identifying human rights risks and impacts |
| 1 | 2 | B.2.2 HRDD - Assessing: Assessment of risks and impacts identified (salient risks and key industry risks) |
| 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 |
| Remedies and Grievance Mechanisms | | |
| 1.5 | 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 |
| 11.0 | 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: UDHR: The Company states in the code of conduct that 'LVMH respects and promotes the Universal Declaration of Human Rights and adheres to the principles of the United Nations Global Compact, as well as to the United Nations Guidelines on Women's Empowerment. Within its sphere of influence, LVMH supports the values, freedoms and fundamental rights promoted in these texts'. [Code of conduct, 2017: r.lvmh-static.com] <p>Score 2</p> <ul style="list-style-type: none"> Not met: UNGPs Met: OECD: Although the Code only indicates that it is 'inspired by' the OECD Guidelines for Multinational Enterprises, in the 'Management report of the board of directors', it states that 'LVMH also supports the Universal Declaration of Human Rights, OECD Guidelines, the International Labour Organization's fundamental conventions, [...]' [Code of conduct, 2017: r.lvmh-static.com] |
| 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"> Met: ILO Core: The company states that 'LVMH respects and promotes the principles of the United Nations Global Compact, in particular the fundamental rights at work' [Code of conduct, 2017: r.lvmh-static.com] Met: UNGC principles 3-6: The Code states that 'LVMH respects and promotes the principles of the United Nations Global Compact, in particular the fundamental rights at work: elimination of discrimination with respect to employment and occupation; elimination of all forms of forced and compulsory labour; effective abolition of child labour; freedom of association and the effective recognition of the right to collective bargaining'. [Code of conduct, 2017: r.lvmh-static.com] Met: Explicitly list ALL four ILO for AP suppliers: The supplier code of conduct contains statements regarding all ILO core labour areas. Particularly on freedom of association and collective bargaining, it states that 'we require our suppliers to respect and recognize the right of workers to negotiate collectively, and to create or join labour organizations of their choice without any sanction, discrimination or harassment'. [Supplier code of conduct, 12/2017: r.lvmh-static.com] <p>Score 2</p> <ul style="list-style-type: none"> Met: Explicit commitment to All four ILO Core: The company states that 'LVMH respects and promotes the principles of the United Nations Global Compact, in particular the fundamental rights at work: elimination of discrimination with respect to employment and occupation; elimination of all forms of forced and compulsory labor; effective abolition of child labor; freedom of association and the effective recognition of the right to collective bargaining'. [Code of conduct, 2017: r.lvmh-static.com] Met: Respect H&S of workers: The code states that 'LVMH takes measures to ensure that the health and safety of its employees and ensures that all its activities comply with applicable workplace health and safety laws and regulations in all its host countries' [Code of conduct, 2017: r.lvmh-static.com] Met: H&S applies to AP suppliers: The code for suppliers contains requirement on health and safety [Supplier code of conduct, 12/2017: r.lvmh-static.com] Not met: working hours for workers: CHRB has not identified any documents in the public domain which provide all the information required to meet this indicator [Code of conduct, 2017: r.lvmh-static.com] Met: Working hours for AP suppliers: The code for suppliers contains requirements on working hours (maximum hours, overtime and rest): 'Our suppliers must comply with all local laws and regulations applicable with respect to working hours, which shall not in any case exceed the maximum set by internationally recognized standards such as the International Labour Organization. |

| Indicator Code | Indicator name | Score (out of 2) | Explanation |
|----------------|--|------------------|---|
| | | | Our suppliers may not impose excessive overtime hours. The total number of hours worked per week including overtime may not exceed legal limits. Workers are entitled to the minimum number of days off established by applicable laws and at minimum must have at least one day off in every seven-day period.' [Supplier code of conduct, 12/2017: r.lvmh-static.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 code of conduct states that the Company performs audits and 'due diligence of stakeholders to better identify, assess and anticipate risks and opportunities for improvement and to ensure in-depth knowledge of its partners. These procedures allow the Group to verify that the performance of its partners is aligned with its requirements and respects the best practices detailed in this Code of Conduct, in particular in terms of ethics, social and environmental issues and respect for human rights'. [Code of conduct, 2017: r.lvmh-static.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Regular stakeholder design engagement: The Company indicates that 'LVMH is closely working with its stakeholders to constantly improve standards and certification schemes.' The Company provided an example, its responsible crocodilian leather sourcing, that was developed with scientists, NGOs and farmers, and that is based on four pillars, which includes 'Preservation of the species and respect for the local communities' and 'Working conditions of men and women on the farms'. However, no details found of regular stakeholder engagement towards the Company's design of monitoring and developing its human rights approach. [Responsible crocodilian sourcing, 18/02/2019: lvmh.com] |
| 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"> • Met: Commits to remedy: In the context of 'respecting and supporting human rights and fundamental freedoms', the code states that 'LVMH is committed to remaining vigilant in identifying any potential direct or indirect negative impact of its activities on society in order to prevent, or if necessary, remedy any such negative impact'. [Code of conduct, 2017: r.lvmh-static.com] <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: The Company indicates that it signed a partnership with UNESCO to support the "Man and Biosphere (MAB)" program. The focus of such action is to preserve biodiversity, but also 'is an intergovernmental scientific program whose major objectives include the reduction of biodiversity loss and addressing ecological, social and economic issues. Because it spans issues that bridge multiple areas – scientific, ecological, social and development – the MAB is an interdisciplinary program that draws on natural and exact sciences, economics and education in order to improve human environments and preserve natural ecosystems. In particular it fosters innovative approaches towards economic development that respects social, cultural and ecological values.' However, no evidence found of collaboration with organisations that provide access to remedy human rights violations. [MAB Program, 14/05/2019: lvmh.com] • Not met: Work with AP suppliers to remedy impacts |

Embedding Respect and Human Rights Due Diligence

| Indicator Code | Indicator name | Score (out of 2) | Explanation |
|----------------|--|------------------|--|
| B.1.1 | Responsibility and resources for day-to-day human rights functions | 1.5 | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Commits to ILO core conventions: See indicator A.1.2. The Company is signatory to the UN Global Compact. • Met: Senior responsibility for HR: The Code states that 'an Ethics and Compliance Director, reporting to the Group Managing Director and an Ethics and Compliance Commission comprising representatives of different LVMH corporate departments [...] is specifically responsible for promoting the principles set out in the Code of conduct [...] ensuring compliance with the Code, analysing and ranking the seriousness of risks identified via a regularly reviewed mapping, contributing to compliance and due diligence audits of partners and managing the functioning and tracking of the alert procedures'. [Code of conduct, 2017: r.lvmh-static.com] |

| Indicator Code | Indicator name | Score (out of 2) | Explanation |
|----------------|--|------------------|---|
| | | | <p>Score 2</p> <ul style="list-style-type: none"> • Met: Day-to-day responsibility: The Company also has a 'network of Ethics and Compliance correspondents' to ensure 'consistent and uniform application of [...] the code of conduct', and a 'network of social responsibility correspondents'. Finally, it also has a 'network of Internal Control correspondents headed by the Audit and Internal Control department, responsible for coordinating implementation of internal control and risk management procedures'. [Code of conduct, 2017: r.lvmh-static.com] • Not met: Day-to-day responsibility for AP in supply chain: The Company states that 'the Group is developing a global policy to ensure that its partners and suppliers adopt best environmental, social and societal practices. The policy involves sensitizing them to the overall issues and providing training in areas specific to their own activities.' However, no evidence of a description regarding day-to-day management of human rights issues was found. [2019 Annual Report, 07/05/2020: r.lvmh-static.com] |
| B.2.1 | Identifying: Processes and triggers for identifying human rights risks and impacts | 1.5 | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Identifying risks in own operations: The Company states that 'The risk map was based on an assessment comparing external benchmarking indicators provided by Verisk Maplecroft with qualitative and quantitative information provided internally by various Group entities, such as their level of activity, the amount of purchases by category, the number of production, logistics and retail sites, and the number of employees. The exercise analyzed a wide variety of factors by geography and sector, including corruption indices, child labor, decent pay and working hours, workplace discrimination, freedom of association and trade union membership, health and safety, forced labor, air quality, waste management, water stress, water quality, deforestation, climate change and risk of drought. The resulting risk map separates out administration, production and distribution activities across these various risks, highlighting the severity of potential risks arising from the Group's own activities and those of its supply chain.' [Registration Document 2019, 29/04/2020: r.lvmh-static.com] • Met: Identifying risks in AP suppliers: See above [Registration Document 2019, 29/04/2020: r.lvmh-static.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Ongoing global risk identification • Not met: In consultation with stakeholders • Met: In consultation with HR experts: As indicated above, the Company uses the help of Verisk Maplecroft to identify its main risks. [Registration Document 2019, 29/04/2020: r.lvmh-static.com] • Not met: Triggered by new circumstances: Although in the context of enterprise risk and internal control assessment, the Company indicates that 'recently acquired entities are allowed two years to implement this approach once the integration process has been completed', it is not clear whether this includes, and how, human rights. No specific evidence found in relation to the supply chain. No additional evidence was found in more recent documents. [Reference document 2017, 2018] |
| B.2.2 | Assessing: Assessment of risks and impacts identified (salient risks and key industry risks) | 1 | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Salient risk assessment (and context): The Company indicates that 'identification of at-risk suppliers was enhanced by means of a new methodological project to specify the different levels of geographical exposure for the activities of LVMH and Group companies on the basis of three issues: 'corruption, human rights and environment. Each mapping allows for levels of risks to be viewed for each country with regard to Group companies' administrative, production and distribution activities'. As indicated in previous indicator, risk mapping exercise included a 'wide variety of factors by geography and sector including corruption indices, child labor, decent pay and working hours, workplace discrimination, freedom of association and trade union membership, health and safety, forced labor, air quality, waste management, water stress, water quality, deforestation, climate change and risk of drought'. [Reference document 2017, 2018 & Registration Document 2019, 29/04/2020: r.lvmh-static.com] • Not met: Public disclosure of salient risks: Although the Company discloses risk identification and assessment, it is not clear which are the specific human rights risks and impacts that it considers salient for its specific case. [Registration Document 2019, 29/04/2020: r.lvmh-static.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 | 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: Action Plans to mitigate risks: The Company reports in relation to its monitoring and auditing processes. However, this indicator looks for action plans considering risk approach rather than specific supplier compliance. [Registration Document 2019, 29/04/2020: r.lvmh-static.com] • Not met: Including in AP supply chain: The Company states that 'The Maisons apply reasonable due diligence measures and audit their suppliers – and, above Tier 1, their subcontractors – to ensure they meet the requirements laid down in the LVMH Supplier Code of Conduct.' However, no further description of the system was found. [Registration Document 2019, 29/04/2020: r.lvmh-static.com] • Not met: Example of Actions decided <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 reports in relation to supplier audits and follow up. However this indicator looks for description of system to check whether human rights risks for which it has been taken actions are being effective. [Registration Document 2019, 29/04/2020: r.lvmh-static.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: 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 [Registration Document 2019, 29/04/2020: r.lvmh-static.com] • 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 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 <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Responding to affected stakeholders concerns • Not met: Ensuring affected stakeholders can access communications |

Remedies and Grievance Mechanisms

| Indicator Code | Indicator name | Score (out of 2) | Explanation |
|----------------|---|------------------|---|
| C.1 | Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers | 1.5 | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Channel accessible to all workers: The Code of conduct indicates that 'LVMH Group has established an internal alert procedure enabling reporting and processing of alerts raised by employees regarding violations or risks of violation of the measures set out in this code of conduct. This alert procedure is available to all employees'. [Code of conduct, 2017: r.lvmh-static.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Number grievances filed, addressed or resolved • Met: Channel is available in all appropriate languages: The Company states that 'LVMH has set up a centralized whistleblowing system, available in around ten languages'. [Registration Document 2019, 29/04/2020: r.lvmh-static.com] • Not met: Expect AP supplier to have equivalent grievance systems • Not met: Opens own system to AP supplier workers |
| C.2 | Grievance channel(s)/mechanism(s) to receive complaints or concerns from external | 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: Grievance mechanism for community: The Company has provided comments to CHRB regarding this indicator. However, evidence was not material. <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Describes accessibility and local languages • Not met: Expects AP supplier to have community grievance systems • Not met: AP supplier communities use global system |

| Indicator Code | Indicator name | Score (out of 2) | Explanation |
|----------------|---|------------------|--|
| | individuals and communities | | |
| C.7 | Remedying adverse impacts and incorporating lessons learned | 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: Describes how remedy has been provided: The Company has provided comments to CHRB regarding this indicator. However, evidence was not material. • Not met: Says how it would remedy key sector risks <p>Score 2</p> <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 |

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"> • Headline: LVMH investigated by 'France 2' over labour abuse in its leather suppliers factories in Tuscany, Italy • Area: working hours • 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. • Sources: [France TV Info - 20/09/2018: francetelevisions.fr][][] |
| 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"> • Not met: Public response available: The company has not been transparent in this case. <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Response goes into detail: The company has not been transparent in this case. |
| 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"> • Met: Company policies address the general issues raised: LVMH's Supplier Code of Conduct contains provisions that prohibit harassment, abuse, and discrimination against workers. Additionally, the Code of Conduct contains provisions that concern the health and safety of employees, their working hours, and their entitlement to fair wages and benefits. [Supplier code of conduct, 12/2017: r.lvmh-static.com] • Met: Policies apply to the type of business relationships involved: Each member-company of the LVMH Group requires that its suppliers respect the ethical principles presented in LVMH's Supplier Code of Conduct. LVMH's suppliers and subcontractors, in turn, must also ensure that their suppliers and subcontractors follow the Code. [Supplier code of conduct, 12/2017: r.lvmh-static.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Policies address the specific rights in question: LVMH's policies cover working hours, stating "Our suppliers must comply with all local laws and regulations applicable with respect to working hours, which shall not in any case exceed the maximum set by internationally recognized standards such as the International Labour Organization. Our suppliers may not impose excessive overtime hours. The total number of hours worked per week including overtime may not exceed legal limits. Workers are entitled to the minimum number of days off established by applicable laws and at minimum must have at least one day off in every seven-day period." In addition, the company states that wage deductions shall not be used as a disciplinary measure. The company also provides data on work-related accidents. [Supplier code of conduct, 12/2017: r.lvmh-static.com & 2018 Social Responsibility Report, 2018: r.lvmh-static.com] |

| Indicator Code | Indicator name | Score (out of 2) | Explanation |
|----------------|--|------------------|--|
| 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"> • Not met: Engages with affected stakeholders: There is no mention that the company has engaged with the affected stakeholders mentioned in the documentary. • Not met: Encourages linked business to engage affected stakeholders • Not met: Provides remedies to affected stakeholders • Not met: Has reviewed management systems to prevent recurrence: Though the company reports about its social audits on its Management Report, there is no information about the review FOLLOWING the allegation. There is no mention of the specific allegation. [Universal Registration Document, 31/12/2019: r.lvmh-static.com] • Not met: Denies allegations, but has engaged affected stakeholders • Not met: Denies allegations, but reviewed systems to prevent such impacts <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Remedies are satisfactory to the victims • Not met: Has improved systems and engaged affected stakeholders • Not met: Denies allegations, but implements review recommendations • Not met: Denies allegations, and ensures systems prevent such impacts |

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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