

**Corporate Human Rights Benchmark
2020 Company Scoresheet**

Company Name Mazda Motor Corporation
Industry Automobiles
Overall Score (*) 14.0 out of 100

Theme Score	Out of	For Theme
1.4	10	A. Governance and Policies
3.4	25	B. Embedding Respect and Human Rights Due Diligence
2.1	15	C. Remedies and Grievance Mechanisms
1.4	20	D. Performance: Company Human Rights Practices
2.8	20	E. Performance: Responses to Serious Allegations
3.1	10	F. Transparency

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

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

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

Detailed assessment

A. Governance and Policies (10% of Total)

A.1 Policy Commitments (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1.1	Commitment to respect human rights	1	The individual elements of the assessment are met or not as follows: Score 1 • Met: UNGC principles 1 & 2: The Company is a signatory of the UNGC [Mazda Signs UNGC, 01/2018: mazda.com] Score 2 • Not met: UNGPs: The Company states that 'Mazda has striven to increase employee awareness of its fundamental approach to respect for human rights, by further clarifying Company policies and standards of behavior among employees, in the light of the basic principles of the United Nations Universal Declaration of Human Rights, the United Nations Guiding Principles on Business and Human Rights'. However, no evidence found of a formal commitment to the United Nations Guiding Principles. [2019 CSR Report, 11/2019: mazda.com] • Not met: OECD
A.1.2	Commitment to respect the human rights of workers	0.5	The individual elements of the assessment are met or not as follows: Score 1 • Met: ILO Core: The Company states in its FY March 2019 Targets that one of the Company's goals is to 'Continue to support international initiatives, including the Universal Declaration of Human Rights and the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work'. Furthermore, in the FY March 2019 Results column, it states that Mazda 'Continued to clarify

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			<p>support for both declarations, in the Mazda Sustainability Report 2018.' [2019 CSR Report, 11/2019: mazda.com]</p> <ul style="list-style-type: none"> • Met: UNGC principles 3-6: The Company is a signatory of the UNGC [Mazda Signs UNGC, 01/2018: mazda.com] • Not met: Explicitly list ALL four ILO for MO suppliers: The Company requests of its suppliers the prohibition of child and forced labour and the abolition of discrimination. It also states that 'We recognize and respect the right of employees to freedom of association or non-association under the legislations in each country and region. However, no evidence found regarding commitments to freedom of association where these rights are not guaranteed by law and collective bargaining. [Supplier CSR Guidelines, 12/2018: mazda.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Explicit commitment to All four ILO Core • Met: Respect H&S of workers: The Company states that 'Under its Safety and Health Creed, Mazda is proactively working to develop people, workplaces, and mechanisms that ensure the safety and health of the employees'. [2019 CSR Report, 11/2019: mazda.com] • Met: H&S applies to MO suppliers: In its supplier CSR guidelines, the Company states that 'We place top priority on safety and health of our employees in their workplace, and strive to prevent accidents and hazards'. [2019 CSR Report, 11/2019: mazda.com & Supplier CSR Guidelines, 12/2018: mazda.com] • Not met: Working hours for workers • Not met: Working hours for MO suppliers: As stated above, the Company requests its suppliers to abide by the guidelines, which include working hours. The Company states that 'We comply with regulations in each country and region for employees' work hours (including overtime), holidays, annual paid leaves and others. However, no evidence found of those requirements including ILO standards for working hours or a regular working week that is not over 48 hours, and includes minimum breaks. [Supplier CSR Guidelines, 12/2018: mazda.com]
A.1.3.MO.a	Commitment to responsible sourcing of minerals	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: Responsible mineral sourcing in conflict areas • Not met: Based on OECD Guidance • Met: Requires responsible mineral sourcing from suppliers: The Company states that 'Non-use of conflict minerals and other raw materials that may cause social issues: We stay on top of the issue of raw materials that contribute to inhumane acts and take appropriate actions to avoid using such materials.' Furthermore, 'Mazda considers that among crucial social problems in the supply chain are human rights violations and illegal extraction in disputed regions and issues regarding conflict minerals, which may be used as financial sources by armed groups. To ensure that conflict minerals and other materials that may cause social problems are not used, the Mazda Supplier CSR Guidelines clearly state Mazda's policy, and the Company requires all suppliers to comply with it.' The Company also states the reach of this policy, as stated in 'Conflict minerals: Minerals and their derivative metals designated by Financial Regulatory Reform Article 1502 that are sourced from and used as financial sources for armed groups in conflict-affected regions in the Democratic Republic of Congo or adjoining countries (Regulated minerals: tantalum, tin, tungsten, gold)'. [Supplier CSR Guidelines, 12/2018: mazda.com & 2019 CSR Report, 11/2019: mazda.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Responsible conflict mineral sourcing covers all minerals • Not met: Suppliers expected to make similar requirements of their suppliers
A.1.3.MO.b	Commitment to respect human rights particularly relevant to the industry (ICT)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Women's Rights: The Company states that 'Through enhancement of measures promoting work-life balance and other initiatives, Mazda is striving to cultivate a workplace in which women can work comfortably. The Company has set the goal of increasing the number of female middle managers and above to three times the figure as of March 31, 2014 by 2020. To achieve this numerical target, Mazda has promoted initiatives according to voluntary action plans. In 2016, the Company submitted these voluntary plans to the authority concerned as the business owner's action plans, based on the Act of Promotion of Women's Participation and Advancement in the Workplace.' However, there is no evidence of a formal commitment regarding women's rights. [2019 CSR Report, 11/2019: mazda.com] • Not met: Children's Rights • Not met: Migrant worker's rights • Not met: Expecting suppliers to respect these rights

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> • Not met: CEDAW/Women's Empowerment Principles • Not met: Child Rights Convention/Business principles • Not met: Convention on migrant workers • Not met: Respecting the right to water • Not met: Expecting suppliers to respect these rights
A.1.4	Commitment to engage with stakeholders	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Commits to stakeholder engagement: The Company states that 'Mazda clarifies key responsibilities and issues that the Mazda Group should accomplish, through dialogue with stakeholders which are important for a company's sustainable development, and carries out daily business activities while making efforts for improvement.' However, no evidence was found on a commitment to engaging with affected stakeholders. [2019 CSR Report, 11/2019: mazda.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Commits to engage stakeholders in design • Not met: Regular stakeholder design engagement
A.1.5	Commitment to remedy	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Commits to remedy <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Not obstructing access to other remedies • Not met: Collaborating with other remedy initiatives • Not met: Work with MO suppliers to remedy impacts
A.1.6	Commitment to respect the rights of human rights defenders	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: Zero tolerance attacks on HRs Defenders (HRDs) <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Expects MO suppliers to reflect company HRD commitments

A.2 Policy Commitments (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.2.1	Commitment from the top	0.5	<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: CEO or Board approves policy: The Company states that 'Each department carries out its operations based on goals and plans formulated with an understanding of the policies and guidelines determined by the CSR Management Strategy Committee, which the president chairs, and in cooperation with other Group companies.' It is also indicated that the CSR Committee is responsible for a few Company sections, which are Customer Satisfaction, Quality, Safety, Environment, Respect for people and Social contributions. The "Respect for people" department includes human rights. However, there is no clear evidence that the policies have approved by the Board or CEO by name. [2019 CSR Report, 11/2019: mazda.com] • Not met: Board level oversight for HRs: The Company states 'The Human Rights Committee, comprising executive officers and division general managers, deliberates on human rights activities, and based on their decisions the Human Resources Office promotes human rights education activities and resolves issues throughout the Group. Each division manager leads the division's activities as the human rights promotion officer at Mazda Motor Corporation, while the person in charge of human rights leads activities at each Mazda business location as well as at Group companies in Japan and overseas'. The Company states that it has an Executive Officer responsible for the CSR department. However, this evidence refers to senior responsibility and human rights operation. This indicator looks for evidence of supervisory board level committee oversight responsibility. [2019 Company Profile, 11/2019: mazda.com & 2019 CSR Report, 11/2019: mazda.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Speeches/letters by Board members or CEO: The Company states 'The Company president delivers to all employees a message on the importance of respect for human rights every year during Human Rights Week, in connection with Human Rights Day on December 10.' [2019 CSR Report, 11/2019: mazda.com]
A.2.2	Board discussions	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: Board/Committee review of salient HRs: The Company states that it has a human rights committee. However, no further details regarding this subject were found. [2019 Annual Report, 09/2019: mazda.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not met: Examples or trends re HR discussion Score 2 <ul style="list-style-type: none"> • Not met: Both examples and process
A.2.3	Incentives and performance management	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Incentives for at least one board member: The Company states that 'The remuneration of internal directors (excluding directors who are Audit & Supervisory Committee members) and executive officers consists of 1) a fixed amount of basic remuneration commensurate with their responsibilities, 2) performance-based remuneration determined at the end of the fiscal year in accordance with a designated standard and process after evaluating how much has been achieved toward goals set based on the business plan.' However, no further details regarding variable remuneration linked to human rights performance were found. [2019 Annual Report, 09/2019: mazda.com] Score 2 <ul style="list-style-type: none"> • Not met: At least one key MO HR risk, beyond employee H&S Score 2 <ul style="list-style-type: none"> • Not met: Performance criteria made public

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

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.1	Responsibility and resources for day-to-day human rights functions	1.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Commits to ILO core conventions: See indicator A.1.2. The Company is signatory to the UNGC. [Mazda Signs UNGC, 01/2018: mazda.com] • Met: Senior responsibility for HR: The Human Rights Committee, comprising executive officers and division general managers, deliberates on human rights activities, and based on their decisions the Human Resources Office promotes human rights education activities and resolves issues throughout the Group. Each division manager leads the division's activities as the human rights promotion officer at Mazda Motor Corporation, while the person in charge of human rights leads activities at each Mazda business location as well as at Group companies in Japan and overseas'. The Company states that it has an Executive Officer responsible for the CSR department. [2019 Company Profile, 11/2019: mazda.com & 2019 CSR Report, 11/2019: mazda.com] Score 2 <ul style="list-style-type: none"> • Met: Day-to-day responsibility: See above. In addition, it indicates that 'Mazda has established a Human Rights Counseling Desk and a Female Employee Counseling Desk to appropriately respond human rights consultations from employees, through providing advices and, supporting early relief from human rights violations'. [2019 CSR Report, 11/2019: mazda.com] • Not met: Day-to-day responsibility for MO in supply chain
B.1.2	Incentives and performance management	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Senior manager incentives for human rights: As stated on indicator A.2.3, executive managers and directors are eligible for variable remuneration linked to performance. However, there is no clear evidence that human rights performance is considered. [2019 Annual Report, 09/2019: mazda.com] Score 2 <ul style="list-style-type: none"> • Not met: At least one key MO HR risk, beyond employee H&S Score 2 <ul style="list-style-type: none"> • Not met: Performance criteria made public
B.1.3	Integration with enterprise risk management	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: HR risks is integrated as part of enterprise risk system: The Company provides evidence of its corporate governance framework. However, no details found on whether human rights related risks are recognised as such in the general risk management framework (integrated in enterprise risk management) [2019 CSR Report, 11/2019: mazda.com] Score 2 <ul style="list-style-type: none"> • Not met: Audit Ctte or independent risk assessment
B.1.4.a	Communication /dissemination of policy commitment(s) within	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Commits to ILO core conventions: The Company is a signatory of the UNGC [Mazda Signs UNGC, 01/2018: mazda.com] • Met: Communicates its policy to all workers in own operations: The Company states that 'Mazda endeavors to deepen awareness and understanding of CSR

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	Company's own operations		<p>among all its executive officers and employees, and to promote the undertaking of CSR initiatives in the course of their daily business activities. The level of employees' CSR awareness is confirmed through Global Employee Survey. To ensure constant improvement of the CSR awareness level, Mazda will continue a range of initiatives'. This includes trainings, distribution of the sustainability report and other measures. The Company states that 'To raise awareness of human rights, Mazda requires all executive officers and employees to consider human rights issues by participating in training programs and educational activities'. [2019 CSR Report, 11/2019: mazda.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Commits to all 4 ILO core conventions • Not met: Communication of policy commitments to stakeholder • Not met: How policy commitments are made accessible to audience
B.1.4.b	Communication /dissemination of policy commitment(s) to business relationships	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: Commits to all 4 ILO core conventions for suppliers • Met: Requiring MO suppliers to communicate policy down the chain: The Company states that 'In cooperation with suppliers and dealerships, Mazda has established a CSR initiative promotion system throughout the entire value chain. The Company places emphasis on dialogues with stakeholders, to ensure that its CSR initiatives not only comply with international rules as well as the laws and regulations of each country/region, but also respect local history, culture, and customs'. In the supplier guidelines, it indicates that 'We ask our suppliers to familiarize themselves with the aims of the updated Guidelines, continue promoting actions in each company to discharge their CSR, and cascade the updated Guidelines to their suppliers so as to ensure robust CSR actions will be taken throughout our supply chain.' [Supplier CSR Guidelines, 12/2018: mazda.com & 2019 CSR Report, 11/2019: mazda.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: How HR commitments made binding/contractual • Not met: Including on MO suppliers
B.1.5	Training on Human Rights	0.5	<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: Scores at least 1 on A.1.2 • Met: Trains all workers on HR policy commitments: The Company states that 'To raise awareness of human rights, Mazda requires all executive officers and employees to consider human rights issues by participating in training programs and educational activities'. [2019 CSR Report, 11/2019: mazda.com] • Not met: Trains relevant MO managers including procurement: The Company states that 'also holds event-based training such as human rights lectures for executive officers and senior managers.' However, no further details regarding how human rights training programs are designed for specific management roles were found, including at least procurement. [2019 CSR Report, 11/2019: mazda.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Score of 2 on A.1.2 • Not met: Both requirements under score 1 met
B.1.6	Monitoring and corrective actions	0.5	<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: Scores at least 1 on A.1.2 • Met: Monitoring implementation of HR policy commitments: The Company states that ' Once a year, the Global Employee survey is conducted to check the progress in human rights initiatives and confirm whether there is any problem to be addressed or not.' [2019 CSR Report, 11/2019: mazda.com] • Met: Monitoring MO suppliers: The Company states that 'The Guidelines request that all Mazda suppliers comply with the guidelines in these areas. The Mazda Green Purchasing Guidelines are separately created to indicate the Company's approach on the environmental protection area in more detail, and Mazda requests that suppliers observe these guidelines. The Company also conducts periodic surveys of suppliers to confirm their compliance status.' Furthermore, 'For each long-term supplier, Mazda conducts not only an evaluation based on the quality, cost and delivery time of the procured goods or services, but also a comprehensive evaluation of the entire business including the quality control system, research & development system, technological capabilities, and the status of its CSR initiatives. For the supplier quality control system, Mazda employs a system that enables continuous grasping of issues, evaluation of the situation, and provision of guidance for improvement by receiving daily reports on product quality as well as voluntary audit results, and when a supplier is in need of quality improvement, conducts quality auditing that involves on-site confirmation of actual products at

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			<p>both domestic and overseas sites.' CSR initiatives include human rights. [2019 CSR Report, 11/2019: mazda.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Score of 2 on A.1.2 • Not met: Describes corrective action process: The Company states 'Mazda carries out various initiatives to eliminate human rights violations. In case a problem involving human rights violations occurs, the Company discloses the case on the intranet as an example of disciplinary action, and conducts educational and awareness raising activities in order to prevent a recurrence. Mazda records the results of handling these cases and manages in accordance with the stipulated procedure, and reports to the Human Rights Committee. These records are used to formulate more effective Companywide policies and to prevent the recurrence of similar problems'. No details found, however, in relation to number of incidences found related to human rights. [2019 CSR Report, 11/2019: mazda.com] • Not met: Example of corrective action: The Company states 'At the meeting of the Human Rights Committee held at the end of FY March 2019, members held discussions based on issues that had occurred in the same fiscal year, to decide the themes for FY March 2020 activities. The selected themes were "improving the quality of dialogue to secure honest communication while paying mutual respect" and "further promoting understanding of diversity of people, including sexual minorities"'. However, this indicator looks for evidence of an example of how it specifically implemented a corrective action plan at one company and/or supplier location to solve a particular human right violation found. [2019 CSR Report, 11/2019: mazda.com] • Not met: Discloses % of MO supply chain monitored
B.1.7	Engaging business relationships	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: HR affects MO selection of suppliers: The Company states that 'Upon receiving a request to start business with Mazda, Mazda assesses the company in question in a fair and even-handed manner according to its in-house criteria for evaluation of suppliers, and determines the feasibility of a business partnership. In addition, Mazda bases its assessments of business dealings with its suppliers on a comprehensive evaluation that covers not only quality, technical strengths, pricing, delivery time and management approach, but also the corporate compliance structure and CSR initiatives, including environmental protection activities'. Furthermore, 'The Company stipulated the Mazda Supplier CSR Guidelines, based on Mazda's basic approach on CSR initiatives [...]. In the Guidelines, CSR activities are categorized into six areas: Customer Satisfaction (Safety/Quality), Environment, Social Contribution, Respect for People (Human Rights/Work), Compliance, and Information Disclosure. The Guidelines request that all Mazda suppliers comply with the guidelines in these areas.' In addition, 'When starting business with a new supplier, related departments coordinate together to confirm the supplier's quality control system, research & development system, technological capabilities, financial conditions, and CSR initiatives, in order to evaluate whether or not the supplier is compliant with the procurement/selection policies of the Mazda Group'. [2019 CSR Report, 11/2019: mazda.com] • Not met: HR affects on-going MO supplier relationships: The Company states that 'Also, Mazda comprehensively evaluates its suppliers every year (271 suppliers in 2018) from the perspectives of quality, pricing, delivery time, etc., in order to build more positive business relationships with them, and passes the results of these evaluations back to the suppliers. Outstanding suppliers are recognized with awards. The Company has also introduced CSR-based evaluation, giving special awards to suppliers that have made outstanding proposals on weight trimming, which greatly affects environmental performance such as fuel efficiency.' However, no evidence regarding the impact of human rights aspects on suppliers contracts was found. [2019 CSR Report, 11/2019: mazda.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirement under score 1 met • Not met: Working with MO suppliers to improve performance
B.1.8	Approach to engagement with potentially affected stakeholders	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Stakeholder process or systems: The Company states that 'Mazda clarifies key responsibilities and issues that the Mazda Group should accomplish, through dialogue with stakeholders which are important for a company's sustainable development, and carries out daily business activities while making efforts for improvement. To ensure effective communications with customers and other respective stakeholders, Mazda has defined its key stakeholders, and determined the frequencies of providing opportunities for dialogue and

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			<p>information disclosure.' Although Mazda states that "stakeholders which are important for a company's sustainable development" are 'Parties who are directly or indirectly related to the business of the Mazda Group', no further details regarding how stakeholders were identified and engaged in last two years. [2019 CSR Report, 11/2019: mazda.com]</p> <ul style="list-style-type: none"> • Not met: Frequency and triggers for engagement: The Company states that 'Mazda has defined its key stakeholders, and determined the frequencies of providing opportunities for dialogue and information disclosure' and lists the "Opportunities for Key Dialogue and Information Disclosure (Frequency)" for each stakeholder. However, no evidence about triggers for engagement was found, including human rights. [2019 CSR Report, 11/2019: mazda.com] • Not met: Workers in MO SC engaged • Not met: Communities in the MO SC engaged <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Analysis of stakeholder views and company's actions on them: The Company states that 'Since FY March 2014, Mazda has conducted a Stakeholder Survey (once a year), inviting opinions from stakeholders outside the Company regarding employee conduct and attitudes toward the promotion of brand value management. The submitted opinions and their analysis results are shared with top management. After clarifying the actual situations and issues to be addressed, the results are announced to Mazda employees and employees of the entire Group in Japan and abroad through MBLD. This provides these employees with opportunities to review their own actions and practices, from the perspective of implementing the corporate vision and strengthening connections with stakeholders'. However, no evidence found of analysis of the input/views given by the stakeholders on human rights issues, and how it was taken into account. [2019 CSR Report, 11/2019: mazda.com]

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.1	Identifying: Processes and triggers for identifying human rights risks and impacts	0.5	<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 states that 'Mazda has been implementing a four-phase process (Step 1–Step 4) to extract the social issues that the Company should address, so as to identify the key CSR issues (materiality). In identifying materiality, Mazda reflects the external opinions of experts and various other stakeholders, while taking into account opinions both from management and the relevant divisions. During the materiality identifying process, Mazda has also referenced the Sustainable Development Goals (SDGs) adopted by the United Nations' and it describes the four steps process, which consists of 'Extraction of social issues; Prioritization; Validation and Disclosure of identification results and development of the PDCA cycle.' However, no was description found of process to identify human rights risks and impacts. [2019 CSR Report, 11/2019: mazda.com] • Not met: Identifying risks in MO suppliers <p>Score 2</p> <ul style="list-style-type: none"> • Met: Ongoing global risk identification: The Company states 'Once a year, the Global Employee survey is conducted to check the progress in human rights initiatives and confirm whether there is any problem to be addressed or not. The results of the survey are fed back to each management and improvement measures are taken as needed.' [2019 CSR Report, 11/2019: mazda.com] • Not met: In consultation with stakeholders: The Company states that 'In identifying materiality, Mazda reflects the external opinions of experts and various other stakeholders, while taking into account opinions both from management and the relevant divisions'. However, it is not clear if it consults (affected) stakeholders in the identification of human rights risks and impacts. [2019 CSR Report, 11/2019: mazda.com] • Not met: In consultation with HR experts: See above • Not met: Triggered by new circumstances
B.2.2	Assessing: Assessment of risks and impacts identified (salient risks)	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: Salient risk assessment (and context): Although the Company presents a description regarding the steps it takes to analyze its social risks, no evidence regarding human rights and how the context is taken into account was found. [2019 CSR Report, 11/2019: mazda.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
	and key industry risks)		<ul style="list-style-type: none"> • Not met: Public disclosure of salient risks: The Company presents the results of its materiality assessment. However, no evidence in relation to human rights assessment and salient issues found. [2019 CSR Report, 11/2019: mazda.com] Score 2 <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met
B.2.3	Integrating and Acting: Integrating assessment findings internally and taking appropriate action	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Action Plans to mitigate risks: The Company indicates that it has a risk management system. It Also states that 'records are used to formulate more effective Companywide policies and to prevent the recurrence of similar problems'. However, no evidence regarding mitigation of salient human rights risks was found. [2019 CSR Report, 11/2019: mazda.com] • Not met: Including in MO supply chain • Not met: Example of Actions decided Score 2 <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met
B.2.4	Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: System to check if Actions are effective • Not met: Lessons learnt from checking effectiveness Score 2 <ul style="list-style-type: none"> • Not met: Both requirement under score 1 met
B.2.5	Communicating : Accounting for how human rights impacts are addressed	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Comms plan re identifying risks [2019 CSR Report, 11/2019: mazda.com] • Not met: Comms plan re assessing risks • Not met: Comms plan re action plans for risks • Not met: Comms plan re reviewing action plans • Not met: Including MO suppliers Score 2 <ul style="list-style-type: none"> • Not met: Responding to affected stakeholders concerns • Not met: Ensuring affected stakeholders can access communications

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.1	Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers	1	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 states that it 'has established the Mazda Global Hotline, as an in-house system to receive reports regarding non-compliance and other issues. With its contact points set up both inside the Company and outside (attorney's office), the hotline enables Mazda Group employees to choose a contact point to submit their reports to either under their real names or anonymously.' [2019 CSR Report, 11/2019: mazda.com] Score 2 <ul style="list-style-type: none"> • Not met: Number grievances filed, addressed or resolved: The Company states that 'The hotline received total of 51 reports, including consultation, in FY March 2019.' However, no specific evidence found regarding human rights. The Company provided feedback to CHRB regarding this indicator, but the supporting document is still not public. [2019 CSR Report, 11/2019: mazda.com] • Not met: Channel is available in all appropriate languages • Not met: Expect MO supplier to have equivalent grievance systems • Not met: Opens own system to MO supplier workers: The Company states that 'The Mazda Global Hotline is also introduced to suppliers so that they can report the questions arose from any transaction' However, it is not made clear whether these reports are only for transactional questions or if they include human rights violations. [2019 CSR Report, 11/2019: mazda.com]
C.2	Grievance channel(s)/mechanism(s) to receive complaints or concerns from external	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Grievance mechanism for community Score 2 <ul style="list-style-type: none"> • Not met: Describes accessibility and local languages • Not met: Expects MO supplier to have community grievance systems • Not met: MO supplier communities use global system

Indicator Code	Indicator name	Score (out of 2)	Explanation
	individuals and communities		
C.3	Users are involved in the design and performance of the channel(s)/mechanism(s)	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: Engages users to create or assess system • Not met: Example of how they do this <p>Score 2</p> <ul style="list-style-type: none"> • Met: Engages with users on system performance: The Company states it 'conducted a questionnaire survey and hearing of local suppliers, regarding the way the Human Rights Counseling Desk was being managed. Also, presented the management method of the Mazda Global Hotline to local suppliers'. Counseling desks are managed by the human resources office and investigates cases received 'investigate all the facts through working in collaboration with related divisions/departments, in sufficient consideration to the intention of the employees who have requested consultations'. [2019 CSR Report, 11/2019: mazda.com] • Not met: Provides user engagement example on performance • Not met: MO suppliers consult users in creation or assessment
C.4	Procedures related to the mechanism(s)/channel(s) are publicly available and explained	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: Response timescales: The Company states ' Mazda promptly responds to consultations, with the goal of rapidly improving the work environment for the affected employee, and offers the necessary support to ensure respect for human rights throughout the entire workplace, through the above-mentioned counseling desks. For example, these desks offer advice on workplace culture improvement to the employee's supervisor, and provide counseling and advice for the employees and other persons concerned. These counseling desks are managed by the Human Resources Office, and following set protocol, all received cases are followed up until they are resolved. To prevent similar cases from occurring, the counseling desks investigate all the facts through working in collaboration with related divisions/departments, in sufficient consideration to the intention of the employees who have requested consultations.' However, no evidence was found on the timescale for these responses. [2019 CSR Report, 11/2019: mazda.com] • Not met: How complainants will be informed • Not met: Who is handling the complaint <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Escalation to senior/independent level: The Company states that 'The critical cases are reported to the management'. However, no further details regarding this subject were found. [2019 CSR Report, 11/2019: mazda.com]
C.5	Commitment to non-retaliation over complaints or concerns made	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Public statement prohibiting retaliation: The Company states that 'The content of these reports is carefully handled, and the whistleblowers' confidentiality is completely protected. In so doing, Mazda takes sufficient follow-up measures to ensure that those who make reports to the hotline or who cooperate in an investigation will not be subject to unfavorable treatment.' However, no formal commitment against retaliation was found. [2019 CSR Report, 11/2019: mazda.com] • Met: Practical measures to prevent retaliation: The Company states 'The content of these reports is carefully handled, and the whistleblowers' confidentiality is completely protected. In so doing, Mazda takes sufficient follow-up measures to ensure that those who make reports to the hotline or who cooperate in an investigation will not be subject to unfavorable treatment.' [2019 CSR Report, 11/2019: mazda.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Has not retaliated in practice • Not met: Expects MO suppliers to prohibit retaliation
C.6	Company involvement with State-based judicial and non-judicial grievance mechanisms	0	<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: Won't impede state based mechanisms • Not met: Complainants not asked to waive rights <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Will work with state based or non judicial mechanisms • Not met: Example of issue resolved (if applicable)

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.7	Remedying adverse impacts and incorporating lessons learned	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Describes how remedy has been provided • Not met: Says how it would remedy key sector risks Score 2 <ul style="list-style-type: none"> • Not met: Changes introduced to stop repetition • Not met: Approach to learning from incident to prevent future impacts • Not met: Evaluation of the channel/mechanism

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

D.5 Automotive Manufacturing

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.5.1.a	Living wage (in own production or manufacturing operations)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Living wage target timeframe: The Company states that 'In wage determination, Mazda is not only in compliance with local laws and regulations in each region both in Japan and overseas, but also taking industry standards into consideration.' However, no evidences regarding living wages determination or target timeframe were found. [2019 CSR Report, 11/2019: mazda.com] • Not met: Describes how living wage determined Score 2 <ul style="list-style-type: none"> • Not met: Achieved payment of living wage • Not met: Regularly review definition of living wage with unions
D.5.1.b	Living wage (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Living wage in supply code or contracts: The Company states that 'We respect regulation in each country and region regarding financial compensation, such as minimum wage, overtime work, payroll deduction, and piece wage.' However, no evidence regarding living wages was found. [Supplier CSR Guidelines, 12/2018: mazda.com] • Not met: Improving living wage practices of suppliers Score 2 <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met • Not met: Provide analysis of trends demonstrating progress
D.5.2	Aligning purchasing decisions with human rights	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Avoids business model pressure on HRs • Not met: Positive incentives to respect human rights: The Company states that 'Outstanding suppliers are recognized with awards. The Company has also introduced CSR-based evaluation, giving special awards to suppliers that have made outstanding proposals on weight trimming, which greatly affects environmental performance such as fuel efficiency.' However, it is not clear if human rights performance is taken into account. [2019 CSR Report, 11/2019: mazda.com] Score 2 <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met
D.5.3	Mapping and disclosing the supply chain	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Identifies suppliers back to product source: The Company states that in 31/03/2019 it had 1.087 suppliers, being 543 of automotive parts, 148 of materials and 396 of equipment and tools. However, there is no evidence on how the Company identifies its suppliers back to its location. [2019 CSR Report, 11/2019: mazda.com] Score 2 <ul style="list-style-type: none"> • Not met: Discloses significant parts of supply chain and why
D.5.4.a	Prohibition on child labour: Age verification and corrective actions (in own production or manufacturing operations)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Does not use child labour • Not met: Age verification of job applicants and workers Score 2 <ul style="list-style-type: none"> • Not met: Remediation if children identified

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.5.4.b	Prohibition on child labour: Age verification and corrective actions (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: Child Labour rules in codes or contracts: The Company states that 'We never tolerate child labor under legal employment age in each country and region.' However, there is no evidence regarding age verification of job applicants and remediation programmes if needed. [Supplier CSR Guidelines, 12/2018: mazda.com] Score 2 <ul style="list-style-type: none"> Not met: How working with suppliers on child labour Not met: Provide analysis of trends demonstrating progress
D.5.5.a	Prohibition on forced labour: Debt bondage and other unacceptable financial costs (in own production or manufacturing operations)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: Pays workers in full and on time Not met: Payslips show any legitimate deductions Score 2 <ul style="list-style-type: none"> Not met: How these practices are implemented and monitored for agencies, labour brokers or recruiters
D.5.5.b	Prohibition on forced labour: Debt bondage and other unacceptable financial costs (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: Debt and fees rules in codes or contracts Not met: How working with suppliers on debt & fees Score 2 <ul style="list-style-type: none"> Not met: Both requirements under score 1 met Not met: Provide analysis of trends in progress made
D.5.5.c	Prohibition on forced labour: Restrictions on workers (in own production or manufacturing operations)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: Does not retain documents or restrict movement Score 2 <ul style="list-style-type: none"> Not met: How sure about agencies or brokers
D.5.5.d	Prohibition on forced labour: Restrictions on workers (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: Free movement rules in codes or contracts Not met: How these practices are implemented and monitored for agencies, labour brokers or recruiters Score 2 <ul style="list-style-type: none"> Not met: Both requirements under score 1 met Not met: Provide analysis of trends in progress made
D.5.6.a	Freedom of association and collective bargaining (in own production or manufacturing operations)	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: Commits not to interfere with union rights and collective bargaining and prohibits intimidation and retaliation: The Company states 'Mazda has a standing labor agreement with the Mazda Workers' Union. The Company build relationships in which everyone thinks and works together with the Union to build environment contributing to all stakeholders. The Company and the Union held discussion on such themes as personnel affairs, production and sales once or twice a month. A discussion with the Mazda Workers' Union is also held regarding operation changes which may have a significant impact. The information about operation changes should be shared with employees with sufficient lead time. Moreover, various measures for discussion with labor are ready in entire Mazda Group to maintain and develop positive labor relations Membership is around 90% of Mazda employees.' However, no evidence was found on a commitment to non-interference (including also explicit commitment to respect the rights to freedom of association and collective bargaining globally, as required in A.1.2). [2019 CSR Report, 11/2019: mazda.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> Met: Discloses % covered by collective bargaining: The Company indicates that it has a 'standing labour agreement with the Mazda Workers' Union', in which 'membership is around 90% of Mazda employees'. [2019 CSR Report, 11/2019: mazda.com] Score 2 <ul style="list-style-type: none"> Not met: Both requirement under score 1 met
D.5.6.b	Freedom of association and collective bargaining (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: FoA & CB rules in codes or contracts: The Company states that 'We maintain sincere dialogue with employee representatives and/or with employees. We recognize and respect the right of employees to freedom of association or non-association under the legislations in each country and region.' However, no evidence found regarding freedom of association and the collective bargaining where those rights are not guaranteed by law. [Supplier CSR Guidelines, 12/2018: mazda.com] Score 2 <ul style="list-style-type: none"> Not met: How working with suppliers on FoA and CB Not met: Both requirements under score 1 met Not met: Provide analysis of trends in progress made
D.5.7.a	Health and safety: Fatalities, lost days, injury rates (in own production of manufacturing operations)	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Met: Injury Rate disclosures: The Company states that 'In FY March 2019, Mazda saw a significant decrease in the injury frequency rate, from the previous year' and it is now at 0.18 [2019 CSR Report, 11/2019: mazda.com] Met: Lost days or near miss disclosure: The Company states that its lost-time injury frequency rate is at 0.06 [2019 CSR Report, 11/2019: mazda.com] Met: Fatalities disclosures: The Company states that 'Unfortunately, however, in October 2018, a fatal accident occurred in which an employee was injured by being caught between a forklift and logistic materials, and passed away.' [2019 CSR Report, 11/2019: mazda.com] Score 2 <ul style="list-style-type: none"> Not met: Set targets for H&S performance: The Company states that 'Under its Safety and Health Creed, Mazda is proactively working to develop people, workplaces, and mechanisms that ensure the safety and health of the employees. In FY March 2017, Mazda launched a new three-year plan and globally promoted all participating-type activities under the three pillars that support the realization of a proactive and enjoyable workplace. The Company believes that it will help invigorate employees and improve their work performance, also leading to the fulfilment of Mazda's Corporate Vision' and that the three pillars are '1) Development of human resources with heightened sensitivity; 2) Realization of a safe, secure and comfortable working environment; 3) Activities on a global basis'. However, no evidence regarding clear health and safety targets were found. [2019 CSR Report, 11/2019: mazda.com] Not met: Met targets or explains why not
D.5.7.b	Health and safety: Fatalities, lost days, injury rates (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: Sets out clear Health and Safety requirements: The Company states that 'We place top priority on safety and health of our employees in their workplace, and strive to prevent accidents and hazards.' However, no evidence found on health and safety requirements and guidelines. [Supplier CSR Guidelines, 12/2018: mazda.com] Score 2 <ul style="list-style-type: none"> Not met: Injury rate disclosures Not met: Lost days or near miss disclosures Not met: Fatalities disclosures Not met: How working with suppliers on H&S Not met: Provide analysis of trends in progress made

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.5.8.a	Women's rights (in own production or manufacturing operations)	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: Process to stop harassment and violence: The Company states that it 'established the Guidelines on Eliminating Sexual Harassment in 1999 and the Rules to Eliminate Human Rights Violations in 2000, prohibiting any activity that may infringe on an employee's human rights, and created a list of rules and guidelines to ensure a good working environment. [...] The most recent revisions were made in compliance with the revised Equal Employment Opportunity Law for Men and Women and the revised Child Care and Family Care Leave Act, both of which came into effect in January 2017. Specifically, in 2017, Mazda revised the Rules to Eliminate Human Rights Violations and formulated the Guidelines to Eliminate Human Rights Violations. In these rules and guidelines, the Company stipulates that inappropriate behavior regarding respect for the human rights of sexual minority or LGBT people, or pregnancy, childbirth, childcare or elderly care leave, constitutes harassment and violates Mazda working regulations. These revised rules and guidelines have been posted on the Company's Intranet, to make them known to everyone in Mazda'. [2019 CSR Report, 11/2019: mazda.com] • Not met: Working conditions take account of gender: See above. However, no details found in relation to how it takes into account differential impacts on women and men working conditions, including reproductive health. [2019 CSR Report, 11/2019: mazda.com] • Not met: Equality of opportunity at all levels: Mazda states that 'has set the goal of increasing the number of female middle managers and above to three times the figure as of March 31, 2014 by 2020. To achieve this numerical target, Mazda has promoted initiatives according to voluntary action plans. In 2016, the Company submitted these voluntary plans to the authority concerned as the business owner's action plans, based on the Act of Promotion of Women's Participation and Advancement in the Workplace. As of March 2019, the number of female middle managers and above has increased to more than twice the figure in FY March 2014. In the future, Mazda will continue to draw up and implement individual development plans for female candidates for middle and above management positions and also further promote the opportunities for female employees, by improving training and promoting female employee recruitment'. Not clear, however, that these takes place at all levels. [2019 CSR Report, 11/2019: mazda.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Meets all of the requirements under score 1
D.5.8.b	Women's rights (in the supply chain)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Women's rights in codes or contracts • Not met: How working with suppliers on women's rights <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirement under score 1 met • Not met: Provide analysis of trends in progress made
D.5.9.a	Working hours (in own production or manufacturing operations)	0	<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: Respects max hours, min breaks and rest periods in its own operations <p>Score 2</p> <ul style="list-style-type: none"> • Not met: How it implements and checks this: The Company states it employs a 'Go Home Early Campaign: By streamlining operations, the Company has reduced the long working hours for divisions not directly connected with production. Examples of this initiative include no-overtime days and setting mandatory lights-out times. (Information about the overtime hours is reported back to management of each division, once in three months to implement the PDCA cycle.)' However, no evidence found of measures in relation to manufacturing operations. [2019 CSR Report, 11/2019: mazda.com]
D.5.9.b	Working hours (in the supply chain)	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: Working hours in codes or contracts: The Company states that 'We comply with regulations in each country and region for employees' work hours (including overtime), holidays, annual paid leaves and others'. However, no evidence found regarding working hours meeting the ILO standards (or establishing maximum working hours for regular working week and minimum breaks), as it focus in country regulations, which can vary significantly between different countries. [Supplier CSR Guidelines, 12/2018: mazda.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: How working with suppliers on working hours • Not met: Both requirements under score 1 met

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not met: Provide analysis of trends in progress made: The Company states ' In FY March 2019, a questionnaire survey was carried out about compliance (fair business practices) and labor practices (reform of working practices), in view of the growing social awareness of these matters. The survey was targeted at approximately 60 local manufacturers, a major percentage of whose sales consisted of products delivered to Mazda. The survey results showed that a progress has been made since FY March 2018.' However, no evidence was found regarding analysis of working hours for suppliers. [2019 CSR Report, 11/2019: mazda.com]
D.5.10.a	Responsible Mineral Sourcing: Arrangements with Suppliers and Smelters/Refiners in the Mineral Resource Supply Chains	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: Due diligence in accordance with OECD Guidance in supplier contracts: The Company states that 'Non-use of conflict minerals and other raw materials that may cause social issues: We stay on top of the issue of raw materials that contribute to inhumane acts and take appropriate actions to avoid using such materials' and details that 'Ex. Conflict Minerals: Minerals and their derivative metals designated by Financial Regulatory Reform Article 1502 that are sourced from and used as financial source of armed groups in the Democratic Republic of Congo or the surrounding countries (Regulated minerals: tantalum, tin, tungsten, gold)'. However, no evidence found regarding the requirement of a due diligence in accordance with OECD standards, and this being contractual. [Supplier CSR Guidelines, 12/2018: mazda.com] • Not met: Works with smelters/refiners and suppliers to build capacity: The Company states that 'To ensure that conflict minerals and other materials that may cause social problems are not used, the Mazda Supplier CSR Guidelines clearly state Mazda's policy, and the Company requires all suppliers to comply with it. In FY March 2019, Mazda conducted a survey on conflict minerals, targeting about 300 suppliers of the parts and materials of vehicles to be supplied to companies to which Mazda vehicles are delivered, in response to the request. The survey was carried out using the format designated by the Electronic Industry Citizenship Coalition (EICC) (now the Responsible Business Alliance [RBA]).' However, no evidence found regarding contribution to building suppliers and smelters/refiners capacity in risk assessment and improving their due diligence performance. [2019 CSR Report, 11/2019: mazda.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Contractual requirement to disclosure smelter/refiner information • Not met: Contractual requirement covers all minerals
D.5.10.b	Responsible Mineral Sourcing: Risk Identification in Mineral Supply Chain	0	<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: Risk identification and disclosure in line with OECD Guidance • Not met: Identification of smelter/refiners and OECD Guidance <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Discloses smelters/refiners judged in line with OECD Guidance • Not met: Risk identification and disclosure covers all minerals
D.5.10.c	Responsible Mineral Sourcing: Risk Management in the Mineral Supply Chain	0	<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 mineral risk management plan for supply chain • Not met: Monitoring, tracking and whether better risk prevention/mitigation over time <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Disclose better risk prevention/mitigation over time • Not met: Suppliers and stakeholders engaged in risk management strategy • Not met: Risk management and response processes cover all minerals
D.5.11	Responsible Materials Sourcing	[SD.5.10]	<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: Due diligence for raw materials in supplier code/contracts: The Company states in its Supplier CSR Guidelines: 'Non-use of conflict minerals and other raw materials that may cause social issues We stay on top of the issue of raw materials that contribute to inhumane acts and take appropriate actions to avoid using such materials.' In addition, it indicates in its Sustainability Report: 'To ensure that conflict minerals and other materials that may cause social problems are not used, the Mazda Supplier CSR Guidelines clearly state Mazda's policy, and the Company requires all suppliers to comply with it.' However, no evidence found of requirements to carry out due diligence (and this being contractual). [Supplier CSR Guidelines, 12/2018: mazda.com & 2019 CSR Report, 11/2019: mazda.com] • Not met: Works with suppliers to build capacity in risk assessment and due diligence

Indicator Code	Indicator name	Score (out of 2)	Explanation
			Score 2 <ul style="list-style-type: none"> • Not met: Meets all requirements under score 1 • Not met: Identify the sources of high-risk raw materials in its supply chain

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
E(1).0	Serious allegation No 1		No allegations meeting the CHRB severity threshold were found, and so the score of 11.22 out of 80 points scored in themes A-D & F has been applied to produce a score of 2.81 out of 20 points for theme E.

F. Transparency (10% of Total)

Indicator Code	Indicator name	Score	Explanation
F.1	Company willingness to publish information	1.07 out of 4	Out of a total of 60 indicators assessed under sections A-D of the benchmark, Mazda made data public that met one or more elements of the methodology in 16 cases, leading to a disclosure score of 1.07 out of 4 points.
F.2	Recognised Reporting Initiatives	2 out of 2	The individual elements of the assessment are met or not as follows: Score 2 <ul style="list-style-type: none"> • Met: Company reports on GRI: The Company states that 'This report has been prepared in accordance with the GRI Standards: Core option.' It presents the GRI Content Index at the end of the document. [2019 CSR Report, 11/2019: mazda.com]
F.3	Key, High Quality Disclosures	0 out of 4	Mazda met 0 of the 10 thresholds listed below and therefore gets 0 out of 4 points for the high quality disclosure indicator. Specificity and use of concrete examples <ul style="list-style-type: none"> • Not met: Score 2 for A.2.2 : Board discussions • Not met: Score 2 for B.1.6 : Monitoring and corrective actions • Not met: Score 2 for C.1 : Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers • Not met: Score 2 for C.3 : Users are involved in the design and performance of the channel(s)/mechanism(s) Discussing challenges openly <ul style="list-style-type: none"> • Not met: Score 2 for B.2.4 : Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts • Not met: Score 2 for C.7 : Remedying adverse impacts and incorporating lessons learned Demonstrating a forward focus <ul style="list-style-type: none"> • Not met: Score 2 for A.2.3 : Incentives and performance management • Not met: Score 2 for B.1.2 : Incentives and performance management • Not met: Score 1 for D.5.1.a: Living wage (in own production or manufacturing operations) • Not met: Score 2 for D.5.7.a: Health and safety: Fatalities, lost days, injury rates (in own production of manufacturing operations)

Disclaimer

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

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

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As WBA, we want to emphasise that the results will always be a proxy for good human rights management, and not an absolute measure of performance. This is because there are no fundamental units of measurement for human rights. Human rights assessments are therefore necessarily more subjective than objective. The Benchmark also captures only a snap shot in time. We therefore want to encourage companies, investors, civil society and governments to look at the broad performance bands that companies are ranked within rather than their precise score because, as with all measurements, there is a reasonably wide margin of error possible in interpretation. We also want to encourage a greater analytical focus on how scores improve over time rather than upon how a company compares to other companies in the same industry today. The spirit of the exercise is to promote continual improvement via an open assessment process and a common understanding of the importance of the UN Guiding Principles on Business and Human Rights.

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