

**Corporate Human Rights Benchmark  
2020 Company Scoresheet**

**Company Name** Mitsubishi Motors Corporation  
**Industry** Automobiles  
**Overall Score (\*)** 8.9 out of 100

Theme Score	Out of	For Theme
1.9	10	A. Governance and Policies
0.7	25	B. Embedding Respect and Human Rights Due Diligence
1.3	15	C. Remedies and Grievance Mechanisms
0.7	20	D. Performance: Company Human Rights Practices
1.8	20	E. Performance: Responses to Serious Allegations
2.7	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	2	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Met: UNGC principles 1 &amp; 2: The Company is a signatory of UNGC since 2019. [Human Rights, N/A: <a href="https://mitsubishi-motors.com">mitsubishi-motors.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Met: UNGPs: The Human Rights policy states that 'Mitsubishi Motors supports and respects the following international norms and standards: [...] The UN Guiding Principles for Business and Human Rights. [Human Rights Policy, 06/2019: <a href="https://mitsubishi-motors.com">mitsubishi-motors.com</a>]</li> <li>Met: OECD: The Company states that supports the OECD Guidelines for Multinational Enterprises. [Mitsubishi Motors Sustainability Report 2019, 2019: <a href="https://mitsubishi-motors.com">mitsubishi-motors.com</a>]</li> </ul>
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 <ul style="list-style-type: none"> <li>Met: UNGC principles 3-6: The Company is a signatory of UNGC since 2019. [Human Rights, N/A: <a href="https://mitsubishi-motors.com">mitsubishi-motors.com</a>]</li> <li>Not met: Explicitly list ALL four ILO for MO suppliers: The Company does not mention collective bargaining in its supplier requirement. [Supplier CSR Guidelines, 06/2019: <a href="https://mitsubishi-motors.com">mitsubishi-motors.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Explicit commitment to All four ILO Core: Although the Company indicates the support to 'ILO Declaration on Fundamental Principles and Rights at Work and relevant standards', no explicit evidence found in relation to commitment to collective bargaining. The Company prohibits discrimination, and doesn't accept 'unjustifiable labor practices such as slavery labor, child labor, or forced labor'. It also 'respects the right of an employee to associate'. [Human Rights Policy, 06/2019: <a href="https://mitsubishi-motors.com">mitsubishi-motors.com</a>]</li> <li>• Met: Respect H&amp;S of workers: The Company reports that strives to ensure access to 'Decent Work', 'such as the provision of safe and healthy workplace'. Additionally, it has established a 'Health and Safety Management Policy'. [Human Rights Policy, 06/2019: <a href="https://mitsubishi-motors.com">mitsubishi-motors.com</a> &amp; Mitsubishi Motors Sustainability Report 2019, 2019: <a href="https://mitsubishi-motors.com">mitsubishi-motors.com</a>]</li> <li>• Met: H&amp;S applies to MO suppliers: The Company indicates: 'The highest priority should be given to ensuring the safety and health of the employees in carrying out their job duties to prevent accidents and disasters' and requires commitment from its suppliers. [Supplier CSR Guidelines, 06/2019: <a href="https://mitsubishi-motors.com">mitsubishi-motors.com</a>]</li> <li>• Not met: Working hours for workers: The Company reports that strives to ensure 'appropriate working hours'. However, it does not indicate a formal commitment to working hours for workers, including regular working week hours and minimum breaks,. Also, or ILO conventions on labour standards on working hours. [Human Rights Policy, 06/2019: <a href="https://mitsubishi-motors.com">mitsubishi-motors.com</a>]</li> <li>• Not met: Working hours for MO suppliers: The Company indicates: 'The regulations of each country pertaining to the number of working hours (including overtime work), and the granting of holidays and annual leave with pay, etc., must be observed'. However, no mention to ILO conventions on labour standards on working hours, or maximum working hours for a regular working week. [Supplier CSR Guidelines, 06/2019: <a href="https://mitsubishi-motors.com">mitsubishi-motors.com</a>]</li> </ul>
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"> <li>• Not met: Responsible mineral sourcing in conflict areas: The Company requires its suppliers to 'non-use of raw materials such as conflict minerals that will cause social problems'. However, no further details which indicate a formal commitment to responsible sourcing of materials. [Supplier CSR Guidelines, 06/2019: <a href="https://mitsubishi-motors.com">mitsubishi-motors.com</a> &amp; Mitsubishi Motors Sustainability Report 2019, 2019: <a href="https://mitsubishi-motors.com">mitsubishi-motors.com</a>]</li> <li>• Not met: Based on OECD Guidance</li> <li>• Met: Requires responsible mineral sourcing from suppliers: The Company reports its concern with conflict minerals and human rights violation, it states: 'In order to ensure that it is not complicit in human rights abuses through the procurement of these conflict minerals, our Supplier CSR Guidelines clearly state our policy of not using conflict minerals as raw materials, and we promote responsible procurement'. Also, in its Supplier CSR Guidelines, it indicates the requirement of 'non-use of raw materials such as conflict minerals that will cause social problems'. [Mitsubishi Motors Sustainability Report 2019, 2019: <a href="https://mitsubishi-motors.com">mitsubishi-motors.com</a> &amp; Supplier CSR Guidelines, 06/2019: <a href="https://mitsubishi-motors.com">mitsubishi-motors.com</a>]</li> <li>• Not met: Requires suppliers to follow the OECD Guidance</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Responsible conflict mineral sourcing covers all minerals</li> <li>• Not met: Suppliers expected to make similar requirements of their suppliers</li> </ul>
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"> <li>• Not met: Women's Rights</li> <li>• Not met: Children's Rights</li> <li>• Not met: Migrant worker's rights</li> <li>• Not met: Expecting suppliers to respect these rights</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: CEDAW/Women's Empowerment Principles</li> <li>• Not met: Child Rights Convention/Business principles</li> <li>• Not met: Convention on migrant workers</li> <li>• Not met: Respecting the right to water</li> <li>• Not met: Expecting suppliers to respect these rights</li> </ul>
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"> <li>• Not met: Commits to stakeholder engagement: The Company reports: 'We contribute to the sustainable development of society while deepening mutual understanding with diverse stakeholders through dialogue, and engaging in business activities centered on automobiles, which are the products we see and</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			use every day'. However, the statement does not indicate a formal commitment to engage with affected (or potentially affected) stakeholders. [Mitsubishi Motors Sustainability Report 2019, 2019: <a href="https://www.mitsubishi-motors.com">mitsubishi-motors.com</a> ] <ul style="list-style-type: none"> <li>• Not met: Regular stakeholder engagement: The Company reports examples of how it engages with its stakeholders. However, no further details to indicate a regular engagement, such as information against previous years, were provided. [Mitsubishi Motors Sustainability Report 2019, 2019: <a href="https://www.mitsubishi-motors.com">mitsubishi-motors.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Commits to engage stakeholders in design</li> <li>• Not met: Regular stakeholder design engagement</li> </ul>
A.1.5	Commitment to remedy	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Met: Commits to remedy: The Company states: 'Where Mitsubishi Motors identifies that it has caused or contributed to a negative impact on human rights, we will provide for or cooperate in legitimate internal and external processes to provide remediation'. [Human Rights, N/A: <a href="https://www.mitsubishi-motors.com">mitsubishi-motors.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Not obstructing access to other remedies</li> <li>• Not met: Collaborating with other remedy initiatives</li> <li>• Not met: Work with MO suppliers to remedy impacts</li> </ul>
A.1.6	Commitment to respect the rights of human rights defenders	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Zero tolerance attacks on HRs Defenders (HRDs)</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Expects MO suppliers to reflect company HRD commitments</li> </ul>

## A.2 Policy Commitments (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.2.1	Commitment from the top	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: CEO or Board approves policy</li> <li>• Not met: Board level oversight for HRs: The Company indicates its 'CSR Management Committee'. However, no further details found, including Human Rights approach. [Mitsubishi Motors Sustainability Report 2019, 2019: <a href="https://www.mitsubishi-motors.com">mitsubishi-motors.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Speeches/letters by Board members or CEO: The Company published in its website a letter from its CEO where it provides an overview of CSR within the Company. Although human rights topics are included (signatory to the UNGC, new HR policy, and importance of diversity), this indicator looks for evidence of a speech/letter that focuses on human rights or discussed its business importance. [Commitment of top management, N/A: <a href="https://www.mitsubishi-motors.com">mitsubishi-motors.com</a>]</li> </ul>
A.2.2	Board discussions	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Board/Committee review of salient HRs</li> <li>• Not met: Examples or trends re HR discussion</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Both examples and process</li> </ul>
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"> <li>• Not met: Incentives for at least one board member</li> <li>• Not met: At least one key MO HR risk, beyond employee H&amp;S</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Performance criteria made public</li> </ul>

## 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	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Met: Commits to ILO core conventions: See indicator A.1.2</li> <li>• Not met: Senior responsibility for HR: The Company indicates its 'CSR Management Committee', chaired by the CEO. However, no details found in relation to human rights. [Mitsubishi Motors Sustainability Report 2019, 2019: <a href="https://www.mitsubishi-motors.com">mitsubishi-motors.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			Score 2 <ul style="list-style-type: none"> <li>• Not met: Day-to-day responsibility</li> <li>• Not met: Day-to-day responsibility for MO in supply chain</li> </ul>
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"> <li>• Not met: Senior manager incentives for human rights</li> <li>• Not met: At least one key MO HR risk, beyond employee H&amp;S</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Performance criteria made public</li> </ul>
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"> <li>• Not met: HR risks is integrated as part of enterprise risk system: The Company reports: 'Mitsubishi Motors has put in place and works to improve its risk management system for the entire Group through three types of risk management activities: priority risk management, departmental risk management and affiliated company risk management'. Also, it states: 'these risk management activities are regularly reported to the Board of Directors as key internal control measures'. However, no evidence of human rights integration in the development of risk management system. [Mitsubishi Motors Sustainability Report 2019, 2019: <a href="http://mitsubishi-motors.com">mitsubishi-motors.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Audit Ctte or independent risk assessment</li> </ul>
B.1.4.a	Communication /dissemination of policy commitment(s) within Company's own operations	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Met: Commits to ILO core conventions: See indicator A.1.2.</li> <li>• Not met: Communicates its policy to all workers in own operations: The Company indicates in a chart that all its employees received Human Rights training. [Mitsubishi Motors Sustainability Report 2019, 2019: <a href="http://mitsubishi-motors.com">mitsubishi-motors.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Commits to all 4 ILO core conventions: See indicator A.1.2</li> <li>• Not met: Communication of policy commitments to stakeholder: Although the Company discloses a chart with its stakeholders and examples of engagement, it does not refer to communication of policy commitments. [Mitsubishi Motors Sustainability Report 2019, 2019: <a href="http://mitsubishi-motors.com">mitsubishi-motors.com</a>]</li> <li>• Not met: How policy commitments are made accessible to audience</li> </ul>
B.1.4.b	Communication /dissemination of policy commitment(s) to business relationships	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Commits to all 4 ILO core conventions for suppliers: See indicator A.1.2.</li> <li>• Met: Requiring MO suppliers to communicate policy down the chain: The Company discloses: 'Aiming for collaborative initiatives with suppliers, Mitsubishi Motors formulated its Supplier CSR Guidelines in 2010. Through these guidelines, we promote collaborative activities with our suppliers from the same point of view'. Additionally, it indicates that 'providing suppliers with appropriate information and two-way communication is essential for proper supply chain management. At the end of every fiscal year, Mitsubishi Motors holds Suppliers Meeting to make our policy for next fiscal year well-known. In addition: 'MMC requests suppliers to comply with Supplier CSR Guidelines and to disseminate them throughout their supply chain and consignment suppliers'. [Supplier CSR Guidelines, 06/2019: <a href="http://mitsubishi-motors.com">mitsubishi-motors.com</a> &amp; Mitsubishi Motors Sustainability Report 2019, 2019: <a href="http://mitsubishi-motors.com">mitsubishi-motors.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: How HR commitments made binding/contractual</li> <li>• Not met: Including on MO suppliers</li> </ul>
B.1.5	Training on Human Rights	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Scores at least 1 on A.1.2</li> <li>• Met: Trains all workers on HR policy commitments: The Company indicates in a chart that all its employees received Human Rights training. [Mitsubishi Motors Sustainability Report 2019, 2019: <a href="http://mitsubishi-motors.com">mitsubishi-motors.com</a>]</li> <li>• Met: Trains relevant MO managers including procurement: The company states: 'As part of managing the Supplier CSR Guidelines, we take efforts to ensure that the guidelines are well-known within the company. As part of Mitsubishi Motors procurement training, we conduct training for new employees (both entry-level and new midcareer employees), as well as training when employees are transferred. In fiscal 2018, briefings were held when the guidelines were re-established in February 2019. [Mitsubishi Motors Sustainability Report 2019, 2019: <a href="http://mitsubishi-motors.com">mitsubishi-motors.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			Score 2 <ul style="list-style-type: none"> <li>Not met: Score of 2 on A.1.2</li> <li>Met: Both requirements under score 1 met</li> </ul>
B.1.6	Monitoring and corrective actions	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Not met: Scores at least 1 on A.1.2</li> <li>Not met: Monitoring implementation of HR policy commitments</li> <li>Met: Monitoring MO suppliers: The Company indicates: 'In order to mutually confirm and promote CSR activities, MMC begins the supplier confirmation of agreement with the guidelines. MMC may ask supplier to take a CSR compliance assessment conducted by a third party, a certified organization, for the purpose of understanding the status of supplier's CSR approaches and encouraging suppliers to enhance them'. Its Supplier's CSR Guidelines contains human rights issues. 'In fiscal 2018, we conducted process audits at 89 suppliers and 115 plants'. [Supplier CSR Guidelines, 06/2019: <a href="https://mitsubishi-motors.com">mitsubishi-motors.com</a> &amp; Mitsubishi Motors Sustainability Report 2019, 2019: <a href="https://mitsubishi-motors.com">mitsubishi-motors.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Not met: Score of 2 on A.1.2</li> <li>Not met: Describes corrective action process: The Company indicates that 'improvements to issues pointed out during these audits were generally implemented in three months or less'. No further details found including corrective action process and number of incidences. [Mitsubishi Motors Sustainability Report 2019, 2019: <a href="https://mitsubishi-motors.com">mitsubishi-motors.com</a>]</li> <li>Not met: Example of corrective action</li> <li>Not met: Discloses % of MO supply chain monitored</li> </ul>
B.1.7	Engaging business relationships	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Not met: HR affects MO selection of suppliers</li> <li>Not met: HR affects on-going MO supplier relationships</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Not met: Both requirement under score 1 met</li> <li>Not met: Working with MO suppliers to improve performance</li> </ul>
B.1.8	Approach to engagement with potentially affected stakeholders	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Not met: Stakeholder process or systems</li> <li>Not met: Frequency and triggers for engagement</li> <li>Not met: Workers in MO SC engaged</li> <li>Not met: Communities in the MO SC engaged</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Not met: Analysis of stakeholder views and company's actions on them</li> </ul>

## 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	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Not met: Identifying risks in own operations: The Company states: 'Mitsubishi Motors will identify, prevent, or mitigate negative impacts on human rights which may be caused by our business activities through the application and support of human rights due diligence processes'. However, no further details found in relation to the process to identify its human rights risks and impacts. [Human Rights Policy, 06/2019: <a href="https://mitsubishi-motors.com">mitsubishi-motors.com</a>]</li> <li>Not met: Identifying risks in MO suppliers</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Not met: Ongoing global risk identification</li> <li>Not met: In consultation with stakeholders</li> <li>Not met: In consultation with HR experts</li> <li>Not met: Triggered by new circumstances</li> </ul>
B.2.2	Assessing: Assessment of risks and impacts identified (salient risks and key industry risks)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Not met: Salient risk assessment (and context)</li> <li>Not met: Public disclosure of salient risks</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Not met: Both requirements under score 1 met</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.3	Integrating and Acting: Integrating assessment findings internally and taking appropriate action	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Action Plans to mitigate risks</li> <li>• Not met: Including in MO supply chain</li> <li>• Not met: Example of Actions decided</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> </ul>
B.2.4	Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: System to check if Actions are effective</li> <li>• Not met: Lessons learnt from checking effectiveness</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Both requirement under score 1 met</li> </ul>
B.2.5	Communicating : Accounting for how human rights impacts are addressed	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Comms plan re identifying risks</li> <li>• Not met: Comms plan re assessing risks</li> <li>• Not met: Comms plan re action plans for risks</li> <li>• Not met: Comms plan re reviewing action plans</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Including MO suppliers</li> <li>• Not met: Responding to affected stakeholders concerns</li> <li>• Not met: Ensuring affected stakeholders can access communications</li> </ul>

### 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"> <li>• Met: Channel accessible to all workers: The Company reports: 'The Mitsubishi Motors Global Hotline established in fiscal 2018 was set up within an outside firm providing such services. This makes it possible to file anonymous reports. Systems for identifying and managing risks of the entire group have been put in place, too, with Mitsubishi Motors headquarters even able to check details of reports from subsidiaries and associates'. Also, it discloses: 'Mitsubishi Motors has established an internal consultation office (Employee Consultation Office) allowing employees of the Company or its subsidiaries and associates in Japan to report or consult about such conduct. Outside the Company, we have set up a consultation office staffed by outside attorneys'. [Mitsubishi Motors Sustainability Report 2019, 2019: <a href="https://mitsubishi-motors.com">mitsubishi-motors.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Number grievances filed, addressed or resolved: Although the Company indicates in a chart the Number of Reports and Consultations Fielded by Consultation Offices by Category, it does not disclose human rights concerns or complaints. [Mitsubishi Motors Sustainability Report 2019, 2019: <a href="https://mitsubishi-motors.com">mitsubishi-motors.com</a>]</li> <li>• Not met: Channel is available in all appropriate languages: Although the Company indicates its Global Hotline, there is no mention to availability in all appropriate languages. [Mitsubishi Motors Sustainability Report 2019, 2019: <a href="https://mitsubishi-motors.com">mitsubishi-motors.com</a>]</li> <li>• Not met: Expect MO supplier to have equivalent grievance systems</li> <li>• Not met: Opens own system to MO supplier workers: The Company indicates: 'we have established a Business Partner Helpline for the suppliers of our procurement division. The helpline receives opinions and comments from business partners, quickly identifies compliance issues or concerns, such as legal or regulatory infractions or unfair practices in our procurement activities, and promptly rectifies them, striving to achieve even fairer business transactions'. However, it is not clear whether the channel is open to suppliers workers to raise concerns. [Mitsubishi Motors Sustainability Report 2019, 2019: <a href="https://mitsubishi-motors.com">mitsubishi-motors.com</a>]</li> </ul>
C.2	Grievance channel(s)/mec	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Grievance mechanism for community</li> </ul>



Indicator Code	Indicator name	Score (out of 2)	Explanation
	hanism(s) to receive complaints or concerns from external individuals and communities		Score 2 <ul style="list-style-type: none"> <li>• Not met: Describes accessibility and local languages</li> <li>• Not met: Expects MO supplier to have community grievance systems</li> <li>• Not met: MO supplier communities use global system</li> </ul>
C.3	Users are involved in the design and performance of the channel(s)/mechanism(s)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Engages users to create or assess system</li> <li>• Not met: Example of how they do this</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Engages with users on system performance</li> <li>• Not met: Provides user engagement example on performance</li> <li>• Not met: MO suppliers consult users in creation or assessment</li> </ul>
C.4	Procedures related to the mechanism(s)/channel(s) are publicly available and explained	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Response timescales</li> <li>• Not met: How complainants will be informed</li> <li>• Not met: Who is handling the complaint</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Escalation to senior/independent level</li> </ul>
C.5	Commitment to non-retaliation over complaints or concerns made	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Public statement prohibiting retaliation: The Company reports in its Global Code of Conduct: 'We shall carry out our work in accordance with this Global Code of Conduct. When we have come to know any violation of this Global Code of Conduct, we shall immediately report it to the Company, and the executives and employees who have come forward with such information based on their own beliefs shall be infallibly protected from any form of retaliation'. However, it is not clear whether the statement includes other stakeholders. [Mitsubishi Motors Sustainability Report 2019, 2019: <a href="https://www.mitsubishi-motors.com">mitsubishi-motors.com</a>]</li> <li>• Met: Practical measures to prevent retaliation: The Company discloses the possibility to file anonymous reports. [Mitsubishi Motors Sustainability Report 2019, 2019: <a href="https://www.mitsubishi-motors.com">mitsubishi-motors.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Has not retaliated in practice</li> <li>• Not met: Expects MO suppliers to prohibit retaliation</li> </ul>
C.6	Company involvement with State-based judicial and non-judicial grievance mechanisms	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Won't impede state based mechanisms</li> <li>• Not met: Complainants not asked to waive rights</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Will work with state based or non judicial mechanisms</li> <li>• Not met: Example of issue resolved (if applicable)</li> </ul>
C.7	Remedying adverse impacts and incorporating lessons learned	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Describes how remedy has been provided</li> <li>• Not met: Says how it would remedy key sector risks</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Changes introduced to stop repetition</li> <li>• Not met: Approach to learning from incident to prevent future impacts</li> <li>• Not met: Evaluation of the channel/mechanism</li> </ul>

## 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"> <li>• Not met: Living wage target timeframe: The Company indicates that 'strives to ensure' a living wage to its employees. However, it does not disclose its target timeframe, nor evidence that it has achieved paying living wage to all employees. [Human Rights Policy, 06/2019: <a href="https://www.mitsubishi-motors.com">mitsubishi-motors.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Not met: Describes how living wage determined</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Achieved payment of living wage</li> <li>• Not met: Regularly review definition of living wage with unions</li> </ul>
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"> <li>• Not met: Living wage in supplier code or contracts</li> <li>• Not met: Improving living wage practices of suppliers</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> <li>• Not met: Provide analysis of trends demonstrating progress</li> </ul>
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"> <li>• Not met: Avoids business model pressure on HRs</li> <li>• Not met: Positive incentives to respect human rights</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> </ul>
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"> <li>• Not met: Identifies suppliers back to product source</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Discloses significant parts of supply chain and why</li> </ul>
D.5.4.a	Prohibition on child labour: Age verification and corrective actions (in own production or manufacturing operations)	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Met: Does not use child labour: The Company states: 'Mitsubishi Motors does not accept any unjustifiable labor practices such as slavery labor, child labor, or forced labor, including human trafficking, and we strive to eliminate such labor practices'. [Human Rights, N/A: <a href="https://mitsubishi-motors.com">mitsubishi-motors.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Age verification of job applicants and workers</li> <li>• Not met: Remediation if children identified</li> </ul>
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"> <li>• Not met: Child Labour rules in codes or contracts: The Company indicates the prohibition of child labor: 'Employment of a child under the age eligible for work as described by the regulations in each country must not be permitted'. No evidence found, however, in relation to age verification requirements nor remediation programmes in place in case child labour is found. [Supplier CSR Guidelines, 06/2019: <a href="https://mitsubishi-motors.com">mitsubishi-motors.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: How working with suppliers on child labour</li> <li>• Not met: Both requirements under score 1 met</li> <li>• Not met: Provide analysis of trends demonstrating progress</li> </ul>
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"> <li>• Not met: Pays workers in full and on time</li> <li>• Not met: Payslips show any legitimate deductions</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: How these practices are implemented and monitored for agencies, labour brokers or recruiters</li> </ul>
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"> <li>• Not met: Debt and fees rules in codes or contracts</li> <li>• Not met: How working with suppliers on debt &amp; fees</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> <li>• Not met: Provide analysis of trends in progress made</li> </ul>



Indicator Code	Indicator name	Score (out of 2)	Explanation
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 • Not met: Does not retain documents or restrict movement Score 2 • 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 • Not met: Free movement rules in codes or contracts: The Company states: 'It shall be guaranteed that all work is voluntary, employees are free to leave their job, and no employee will be forced to work'. However, no evidence found specifically related to free movement and retention of passports or other identification document. [Supplier CSR Guidelines, 06/2019: <a href="https://mitsubishi-motors.com">mitsubishi-motors.com</a> ] • Not met: How these practices are implemented and monitored for agencies, labour brokers or recruiters Score 2 • 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)	0	The individual elements of the assessment are met or not as follows: Score 1 • Not met: Commits not to interfere with union rights and collective bargaining and prohibits intimidation and retaliation: Although the Company indicates its efforts to support labor unions, in addition to collective bargaining, the measures in order to prohibit harassment, violence and intimidation are not clear. [Mitsubishi Motors Sustainability Report 2019, 2019: <a href="https://mitsubishi-motors.com">mitsubishi-motors.com</a> ] • Not met: Discloses % covered by collective bargaining: The Company indicates: 'As of April 2019, our labor union had 12,655 members (excluding reemployed senior staff), accounting for 99% of general employees excluding officers and management'. Not clear, however, the total percentage of workforce covered by collective bargaining agreements. [Mitsubishi Motors Sustainability Report 2019, 2019: <a href="https://mitsubishi-motors.com">mitsubishi-motors.com</a> ] Score 2 • 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 • Not met: FoA & CB rules in codes or contracts: The Company states: 'The freedom of association by employees should be recognized according to the regulations of each country'. However, no further details found including non-retaliation to union members or representatives, collective bargaining, and alternative mechanisms in those places where the exercise of these rights is restricted under local law. [Supplier CSR Guidelines, 06/2019: <a href="https://mitsubishi-motors.com">mitsubishi-motors.com</a> ] • Not met: How working with suppliers on FoA and CB Score 2 • 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 • Met: Injury Rate disclosures: The Company discloses the accident frequency of 0.41 in 2018. [Mitsubishi Motors Sustainability Report 2019, 2019: <a href="https://mitsubishi-motors.com">mitsubishi-motors.com</a> ] • Met: Lost days or near miss disclosure: The Company indicates the accident rate with loss of workdays of 0.10 in 2018. [Mitsubishi Motors Sustainability Report 2019, 2019: <a href="https://mitsubishi-motors.com">mitsubishi-motors.com</a> ] • Met: Fatalities disclosures: The Company discloses there were no fatal accidents in fiscal 2018. [Mitsubishi Motors Sustainability Report 2019, 2019: <a href="https://mitsubishi-motors.com">mitsubishi-motors.com</a> ] Score 2 • Not met: Set targets for H&S performance: The Company discloses the 'Creation of safe workplaces' as target for Health and Safety in 2018. Also, it discloses the target of 'Ongoing measures for the creation of safe workplaces' in 2019. However, no specific quantitative targets found, or a target of zero harm. [Mitsubishi Motors Sustainability Report 2019, 2019: <a href="https://mitsubishi-motors.com">mitsubishi-motors.com</a> ]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Not met: Met targets or explains why not: The Company indicates the target of 'Creation of safe workplaces' and discloses the number of accidents with or without loss of workdays in 2018. However, it is not clear whether the target was met or not. [Mitsubishi Motors Sustainability Report 2019, 2019: <a href="https://www.mitsubishi-motors.com">mitsubishi-motors.com</a>]</li> </ul>
D.5.7.b	Health and safety: Fatalities, lost days, injury rates (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"> <li>• Not met: Sets out clear Health and Safety requirements</li> <li>• Not met: Injury rate disclosures</li> <li>• Not met: Lost days or near miss disclosures</li> <li>• Not met: Fatalities disclosures</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: How working with suppliers on H&amp;S</li> <li>• Not met: Provide analysis of trends in progress made</li> </ul>
D.5.8.a	Women's rights (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"> <li>• Not met: Process to stop harassment and violence: Although the Company states: 'We do not tolerate unfair discrimination or harassment on bases such as race, color of skin, nationality, ethnicity, family origin, sex, sexual orientation, gender identity, age, disability, language, or religion', no further evidence found, including processes to prohibit harassment, intimidation and violence against women. [Human Rights Policy, 06/2019: <a href="https://www.mitsubishi-motors.com">mitsubishi-motors.com</a>]</li> <li>• Not met: Working conditions take account of gender</li> <li>• Not met: Equality of opportunity at all levels</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Meets all of the requirements under score 1</li> </ul>
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"> <li>• Not met: Women's rights in codes or contracts: The Company states: 'In all cases of employment, there must be no discrimination against any race, ethnic group, country of origin, nationality, religion, gender, and so forth'. However, no further details related to women's rights. [Supplier CSR Guidelines, 06/2019: <a href="https://www.mitsubishi-motors.com">mitsubishi-motors.com</a>]</li> <li>• Not met: How working with suppliers on women's rights</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both requirement under score 1 met</li> <li>• Not met: Provide analysis of trends in progress made</li> </ul>
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"> <li>• Not met: Respects max hours, min breaks and rest periods in its own operations: The Company states that strives to ensure access to appropriate working hours. However, no mention to ILO conventions on labour standards on working hours, or to maximum working hours for a regular working week and minimum breaks. [Human Rights Policy, 06/2019: <a href="https://www.mitsubishi-motors.com">mitsubishi-motors.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: How it implements and checks this</li> </ul>
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"> <li>• Not met: Working hours in codes or contracts: The Company states: 'The regulations of each country pertaining to the number of working hours (including overtime work), and the granting of holidays and annual leave with pay, etc., must be observed'. However, no evidence against respect to ILO conventions on working hours, or specific requirements regarding maximum working hours for regular working week and minimum breaks. [Supplier CSR Guidelines, 06/2019: <a href="https://www.mitsubishi-motors.com">mitsubishi-motors.com</a>]</li> <li>• Not met: How working with suppliers on working hours</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> <li>• Not met: Provide analysis of trends in progress made</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.5.10.a	Responsible Mineral Sourcing: Arrangements with Suppliers and Smelters/Refiners in the Mineral Resource Supply Chains	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Not met: Due diligence in accordance with OECD Guidance in supplier contracts</li> <li>Not met: Works with smelters/refiners and suppliers to build capacity</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Not met: Contractual requirement to disclosure smelter/refiner information</li> <li>Not met: Contractual requirement covers all minerals</li> </ul>
D.5.10.b	Responsible Mineral Sourcing: Risk Identification in Mineral Supply Chain	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Not met: Risk identification and disclosure in line with OECD Guidance</li> <li>Not met: Identification of smelter/refiners and OECD Guidance</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Not met: Discloses smelters/refiners judged in line with OECD Guidance</li> <li>Not met: Risk identification and disclosure covers all minerals</li> </ul>
D.5.10.c	Responsible Mineral Sourcing: Risk Management in the Mineral Supply Chain	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Not met: Describes mineral risk management plan for supply chain</li> <li>Not met: Monitoring, tracking and whether better risk prevention/mitigation over time</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Not met: Disclose better risk prevention/mitigation over time</li> <li>Not met: Suppliers and stakeholders engaged in risk management strategy</li> <li>Not met: Risk management and response processes cover all minerals</li> </ul>
D.5.11	Responsible Materials Sourcing	[SD.5.10]	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Not met: Due diligence for raw materials in supplier code/contracts: The Company states: 'To avoid the use of raw materials involving an inhumane act, it is essential to comprehend the situation as well as take appropriate measures'. However no further evidences against requirements to conduct due diligence for raw materials. [Supplier CSR Guidelines, 06/2019: <a href="https://mitsubishi-motors.com">mitsubishi-motors.com</a>]</li> </ul> <ul style="list-style-type: none"> <li>Not met: Works with suppliers to build capacity in risk assessment and due diligence</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Not met: Meets all requirements under score 1</li> <li>Not met: Identify the sources of high-risk raw materials in its supply chain</li> </ul>

### 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 7.16 out of 80 points scored in themes A-D & F has been applied to produce a score of 1.79 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	0.67 out of 4	Out of a total of 60 indicators assessed under sections A-D of the benchmark, Mitsubishi made data public that met one or more elements of the methodology in 10 cases, leading to a disclosure score of 0.67 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"> <li>Met: Company reports on GRI: The Company discloses its GRI report. [Mitsubishi Motors Sustainability Report 2019, 2019: <a href="https://mitsubishi-motors.com">mitsubishi-motors.com</a>]</li> </ul>
F.3	Key, High Quality Disclosures	0 out of 4	Mitsubishi 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"> <li>Not met: Score 2 for A.2.2 : Board discussions</li> <li>Not met: Score 2 for B.1.6 : Monitoring and corrective actions</li> <li>Not met: Score 2 for C.1 : Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers</li> <li>Not met: Score 2 for C.3 : Users are involved in the design and performance of the channel(s)/mechanism(s)</li> </ul> Discussing challenges openly

Indicator Code	Indicator name	Score	Explanation
			<ul style="list-style-type: none"> <li>• Not met: Score 2 for B.2.4 : Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts</li> <li>• Not met: Score 2 for C.7 : Remedying adverse impacts and incorporating lessons learned</li> </ul> Demonstrating a forward focus <ul style="list-style-type: none"> <li>• Not met: Score 2 for A.2.3 : Incentives and performance management</li> <li>• Not met: Score 2 for B.1.2 : Incentives and performance management</li> <li>• Not met: Score 1 for D.5.1.a: Living wage (in own production or manufacturing operations)</li> <li>• Not met: Score 2 for D.5.7.a: Health and safety: Fatalities, lost days, injury rates (in own production of manufacturing operations)</li> </ul>

## 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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