

Score

13.0

26

Corporate Human Rights Benchmark 2020 Company Scoresheet



Company Name Next

Industry Apparel (Supply Chain only)

For indicators

UNGP Core Score (*) 13.0 out of 26

Out of

Score	Out of	For indicators
Governance a	and Policy Comm	nitments
2	2	A.1.1 Commitment to respect human rights
1.5	2	A.1.2 Commitment to respect the human rights of workers
1	2	A.1.4 Commitment to engage with stakeholders
0.5	2	A.1.5 Commitment to remedy
Embedding r	espect and Hun	nan Rights Due Diligence
Embeddir	ng respect	
2	2	B.1.1 Embedding - Responsibility and resources for day-to-day human rights functions
Human R	ights Due Diliger	nce (HRDD)
1.5	2	B.2.1 HRDD - Identifying: Processes and triggers for identifying
_	_	human rights risks and impacts
2	2	B.2.2 HRDD - Assessing: Assessment of risks and impacts identified (salient risks and key industry risks)
2	2	B.2.3 HRDD - Integrating and Acting: Integrating assessment findings internally and taking appropriate action
0	2	B.2.4 HRDD - Tracking: Monitoring and evaluating the
Ü	-	effectiveness of actions to respond to human rights risks and
0.5	2	impacts
0.5	2	B.2.5 HRDD - Reporting: Accounting for how human rights impacts are addressed
Remedies and	d Grievance Med	hanisms
0	2	C.1 Grievance channels/mechanisms to receive complaints or concerns from workers
0	2	C.2 Grievance channels/mechanisms to receive complaints or concerns from external individuals and communities
0	2	C.7 Remedying adverse impacts and incorporating lessons learned

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

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

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

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

Detailed assessment

Governance and Policies

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1.1	Commitment to respect human rights	2	The individual elements of the assessment are met or not as follows: Score 1 • Met: UDHR: In its 'Code of Practice Principle Standards' document the Company states: 'Next supports the principles contained within the Universal Declaration of Human Rights and the fundamental labour principles that protect workers' rights as defined in the International Labour Organization's (ILO) Declaration on Fundamental Principles and Rights at Work (ILO Core Conventions)'. [Code of Practice Principle Standards, 05/2019: nextplc.co.uk] Score 2 • Met: UNGPs: The Company states: 'Our approach is to implement the United Nations Guiding Principles on Business and Human Rights (UNGPs) and this influences our work on all aspects of the supply chain. It helps us to recognise and manage the risk of harm associated with unsatisfactory working conditions, discrimination, modern slavery, human trafficking and forced or bonded labour, particularly to the most vulnerable and exploited, such as women and children'. The Company also indicates that it is 'committed to working in accordance with the UN Guiding Principles on Business and Human Rights [] Next is committed to upholding these human rights standards in its business operations and supply chain. [Code of Practice Principle Standards, 05/2019: nextplc.co.uk]
A.1.2	Commitment to respect the human rights of workers	1.5	The individual elements of the assessment are met or not as follows: Score 1 • Met: ILO Core: The Company states in its human rights policy that 'We are committed to ensuring that people are treated with dignity and respect by upholding internationally recognised human rights principles encompassed in the Universal Declaration of Human Rights and the International Labour Organization's Declaration on Fundamental Principles and Rights at Work'. [Human Rights and Modern Slavery Policy, 03/2017: nextplc.co.uk] • Met: Explicitly list ALL four ILO for AP suppliers: As indicated above, the Code of Practice Principle Standards include provisions covering all ILO Core. With respect freedom of association and collective bargaining, the Code says: 'The supplier and its factories must recognise and respect the right of the employee to join and organise associations of their own choosing and to bargain collectively. Where law restricts the right to freedom of association and collective bargaining, suppliers must not obstruct parallel means for free association and collective bargaining.' In addition the Company indicates that: 'Next expects its suppliers to understand, take responsibility for and ownership of for implementing the Code of Practice Principle Standards throughout their own supply chains and business operations. Compliance to the Code of Practice Principle Standards will be measured through the Code of Practice Auditing Standards and local law, which applies to all suppliers within our supply chain and business operations.' [Code of Practice Principle Standards, 05/2019: nextplc.co.uk] Score 2 • Not met: Explicit commitment to All four ILO Core: As indicated above, the Company's Code of Practice include provisions covering all ILO core. However, it does not seem to cover the Company's own operations. The Company's Human rights and modern slavery policy contains commitments regarding forced labour, child labour and discrimination and freedom of association. In relation to this last one, it states that NEXT

Indicator Code	Indicator name	Score (out of 2)	Explanation
			 Met: Respect H&S of workers: The Company has a 'Health & Safety policy statement' containing company's commitments and actions on health and safety. [Health & Safety Policy Statement, 2018: nextplc.co.uk] Met: H&S applies to AP suppliers: See above. The Company states: 'Suppliers and their factories must provide their employees with a safe and healthy working environment and continue to work towards preventing work-related accidents and maintaining the welfare and safety of their employees.' [Code of Practice Principle Standards, 05/2019: nextplc.co.uk] Not met: working hours for workers: Its Code of Practice include a principle related with 'Lawful Working Hours'. Lawful Working Hours are defined as the following: 'The normal working hours should not exceed 48 hours per week and must comply with national laws or the benchmark industry standards, whichever offers greater protection. Overtime working shall be voluntary, should not exceed 12 hours per week and will not be demanded on a regular basis. Employees must be compensated for overtime at the rate legally required in the country of manufacture or, in those countries where such laws do not exist, at a rate exceeding the regular hourly compensation rate'. However, this statement seems to apply to suppliers. No evidence found of the Company's own employees being covered by this code. [Code of Practice Principle Standards, 05/2019: nextplc.co.uk] Met: Working hours for AP suppliers: The Company states it 'expects its suppliers to understand, take responsibility for and ownership of for implementing the Code of Practice Principle Standards throughout their own supply chains and business operations' [Code of Practice Principle Standards, 05/2019: nextplc.co.uk]
A.1.4	Commitment to engage with stakeholders	1	The individual elements of the assessment are met or not as follows: Score 1 • Met: Regular stakeholder engagement: The Company discloses some information about some initiatives of collaborative work such as: ACT, SHIFT, ACCORD, Ethical Training Initiative, Labour Education and Service Network, etc. In addition, in its CR Report, the Company lists its stakeholders groups and the engagement activities conducted during the year, such as: 'Workforce: Workforce communication forums; Workforce engagement surveys; Training and development ' [Our approach to CR 2020, N/A: nextplc.co.uk & CR Report 2020, 01/05/2020: nextplc.co.uk] Score 2 • Not met: Commits to engage stakeholders in design: The Company also states: 'It is important and valuable to work with others to develop solutions for some of the more complex and systemic problems found within global supply chains that we can not solve alone. We believe that by maintaining strong direct relationships and undertaking collaborative work (such as sharing information and resources with other retailers, brands, trade unions and NGOs) we are all able to work together in partnership to deliver real benefits to workers in our supply chains.' However, it is not clear whether the Company commits to engage with affected stakeholders in the design or monitoring of its human rights approach. [CR Report 2020, 01/05/2020: nextplc.co.uk] • Not met: Regular stakeholder design engagement: The Company discloses information about its 'Supplier Empowerment Programme' (SEP) Project in Pakistan: 'At the end of 2018, in partnership with one of our key suppliers in Pakistan, we commenced a SEP focusing on three areas: []; Worker and management dialogue to develop a robust grievance mechanism process; []' However, no further details found, including regular engagement with affected stakeholders in developing or monitoring the Company's human rights approach.
A.1.5	Commitment to remedy	0.5	[CR Report 2020, 01/05/2020: nextplc.co.uk] The individual elements of the assessment are met or not as follows: Score 1 Not met: Commits to remedy: In its Human Rights and Modern Slavery Policy the Company states: 'NEXT has policies and procedures in place to identify, prevent or mitigate human rights' risks and remediate any adverse impact operations may have caused or contributed to', although this is not a direct commitment. The Company indicates in the Code of Practice, principle standards document that 'Next is committed to working in accordance with the UN Guiding Principles on Business and Human Rights. Companies have the responsibility to protect human rights through policies and working with robust standards and processes that will identify, prevent and manage the remediation of any human rights risks'. However, neither of these statements represent a clear commitment to remedy adverse impacts that it has caused or contributed to including all workers, individuals and communities. [Human Rights and Modern Slavery Policy, 03/2017: nextplc.co.uk & Code of Practice Principle Standards, 05/2019: nextplc.co.uk] Score 2 Not met: Not obstructing access to other remedies

Indicator Code	Indicator name	Score (out of 2)	Explanation
			• Not met: Collaborating with other remedy initiatives: The Company includes in its
			'Our approach to CR' document a list with different initiatives where it is involved,
			such as: ACCORD, SHIFT, 'British Retail Consortium', Ethical Trading Initiative and
			ACT (Action, Collaboration, Transformation), among others. However, is not clear if
			it collaborates in initiatives that provide access to remedy. [Our approach to CR
			2020, N/A: nextplc.co.uk]
			• Met: Work with AP suppliers to remedy impacts: The Company reports in its 'Our
			approach to CR' document: 'During the year we worked with a factory in
			Bangladesh which had experienced challenges around FoA, where 34 workers had
			been dismissed for attempting to form a union on site. The process involved
			regular dialogue with the factory and supplier concerned, as well as engagement
			with the local trade union. A remediation plan was agreed, which included
			engaging with the affected workers to understand their wishes and to ensure they
			were offered their jobs back. Our in-country Code of Practice (COP) team maintain
			contact with the factory to ensure improvements are maintained'. [Our approach
			to CR 2020, N/A: <u>nextplc.co.uk</u>]

Embedding Respect and Human Rights Due Diligence

Indicator Code	Indicator name	Score (out of 2)	Explanation
Indicator Code B.1.1			Explanation The individual elements of the assessment are met or not as follows: Score 1 • Met: Commits to ILO core conventions: See indicator A.1.2. The Company is committed to ILO conventions. • Met: Senior responsibility for HR: The Company indicates in its Corporate Responsibility Report 2020: 'The Group Finance Director has responsibility for all corporate responsibility matters, including human rights and modern slavery. She receives regular updates from the Head of Corporate Responsibility and Sustainable Development. Regular updates are also provided to the Audit Committee. In addition, the Head of Supplier Ethical Compliance provides monthly updates to the Product teams and at least annually to the Audit Committee, reporting on the performance of our global supply chain as measured against our Code of Practice Principle Standards'. [CR Report 2020, 01/05/2020: nextplc.co.uk'] Score 2 • Met: Day-to-day responsibility: As indicated above, Head of Corporate responsibility and sustainable development. Also Head of Supplier Ethical Compliance. It describes its Code of Practice team (COP): 'Having our own team is key to NEXT establishing direct relationships and building trust with our suppliers, as well as delivering a direct understanding of issues at source and the drivers of non-compliance.[] Our technical team comprises of around 300 global employees, with technologists from Head Office and our global sourcing offices visiting our suppliers to ensure our sourcing and production standards are being met'. [CR Report 2020, 01/05/2020: nextplc.co.uk] • Met: Day-to-day responsibility for AP in supply chain: As indicated above, the Company states: 'NEXT Global COP Team: 46 people based in 12 key sourcing locations; Work directly with new and existing suppliers and their factories to ensure they understand our requirements; On the ground presence enables quick response if issues occur and allow the building of strong relationships with our suppliers by being able to offer one to one meetings, trainin
			ensure they understand our requirements; On the ground presence enables quick response if issues occur and allow the building of strong relationships with our
			with our product teams is vital to the success and effectiveness of managing the ethical standards we expect from our suppliers. [] Our technical team comprises of around 300 global employees, with technologists from Head Office and our global sourcing offices visiting our suppliers to ensure our sourcing and production standards are being met.' [CR Report 2020, 01/05/2020: nextplc.co.uk]

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.1	Identifying: Processes and triggers for identifying human rights risks and impacts	1.5	The individual elements of the assessment are met or not as follows: Score 1 • Met: Identifying risks in own operations: In its CR Report 2020, the Company indicates: 'Our approach is to implement the United Nations Guiding Principles on Business and Human Rights (UNGPs) and this influences our work on all aspects of the supply chain. It helps us to recognise and manage the risk of harm associated with unsatisfactory working conditions, discrimination, modern slavery, human trafficking and forced or bonded labour, particularly to the most vulnerable and exploited, such as women and children. [] During 2019, we reviewed our current salient human rights risks with support from SHIFT []. We combined the knowledge and experience gained from working with our global supply chain and business partners, together with learnings from affected stakeholders and NGOs to assess what presents the greatest risks to people by looking at our business through a "salience lens" to ensure our priorities and approach remains relevant.' [CR Report 2020, 01/05/2020: nextplc.co.uk] • Met: Identifying risks in AP suppliers: See above. In addition, in its CR Report 2017, the Company describes its process to identify salient human rights issues (Deep Dive): 'Over the last 2 years we have undertaken the following 4 step process: Step 1: Initial risk assessment of our salient human rights issues; Step 2: "Deep dive" into supply chain human rights issues to recognise potential impacts, assess potential severity or likelihood of the impacts and identify stakeholders who have the greatest potential to be impacted or harmed; Step 3: External review to test identified human rights issues with relevant stakeholders; Step 4: Strengthened communication on our approach to human rights including training of all employees and suppliers'. [Corporate Responsibility Report, Jan 2017: nextplc.co.uk] • Met: In consultation with HR experts: As indicated above, the Company 'reviewed [its] current salient human rights risks with support from SHIFT (
B.2.2	Assessing: Assessment of risks and impacts identified (salient risks and key industry risks)	2	The individual elements of the assessment are met or not as follows: Score 1 • Met: Salient risk assessment (and context): In its CR Report 2017, the Company describes its process to identify salient human rights issues (Deep Dive): 'Over the last 2 years we have undertaken the following 4 step process: Step 1: Initial risk assessment of our salient human rights issues.; Step 2: "Deep dive" into supply chain human rights issues to recognise potential impacts, assess potential severity or likelihood of the impacts and identify stakeholders who have the greatest potential to be impacted or harmed. Step 3: External review to test identified human rights issues with relevant stakeholders. Step 4: Strengthened communication on our approach to human rights including training of all employees and suppliers'. In addition, in its CR Report 2020, it indicates: 'During 2019, we reviewed our current salient human rights risks with support from SHIFT []. The review included workshops with key senior management to map risks according to severity and likelihood, as well as considering factors such as supply chain tier, geographical location and vulnerability of impacted groups.' [Corporate Responsibility Report, Jan 2017: nextplc.co.uk & CR Report 2020, 01/05/2020: nextplc.co.uk] • Met: Public disclosure of salient risks: The Company states: 'As a result of the review our revised salient human rights risks were identified as: Freedom of association and collective bargaining; Health and safety, including mental health; Children's rights; Modern slavery, including wage retention; Wage levels, including fair wages; Harassment and discrimination; Water, sanitation and health; Working hours; Privacy and data security'. [CR Report 2020, 01/05/2020: nextplc.co.uk] • Met: Both requirements under score 1 met

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.3	Integrating and Acting: Integrating assessment findings internally and taking appropriate action	2	The individual elements of the assessment are met or not as follows: Score 1 • Met: Action Plans to mitigate risks: In its CR Focus Updates 2017, the Company describes the different lines of action taken to face each one of the salient human rights issues identified in its Deep Dive process. (Next sub indicator presents an example). In addition, in its 'Our approach to CR' document, the Company discloses information about the key activities conducted with respect each one of its salient human rights issues. For instance, with respect 'Working Hours': 'Issued our revised Auditing Standards for suppliers, including detailed information on our expectation in relation to working hours; Work in partnership with factories where working hours issues are identified through our COP audits'. [CR Focus Updates, 2017: nextplc.co.uk & Our approach to CR 2020, N/A: nextplc.co.uk] • Met: Including in AP supply chain: See above. The activities listed cover its supply chain. [CR Focus Updates, 2017: nextplc.co.uk] • Met: Example of Actions decided: In its CR Focus updates 2017, the Company discloses information about its work to face its identified salient human rights issues. In reference to human rights issue 'Forced Labour and Modern Slavery', the Company indicates: 'We are committed to tackling this complex issue through effective due diligence and risk assessment, raising the awareness of modern slavery and collaborating with others to protect the most vulnerable groups of workers. Signs of modern slavery can often be very subtle and difficult to identify. Audits may not always uncover workers that may be impacted by this criminal activity. A specific focus of our work is on our UK supply chain with regard to bonded labour, as well as the key sourcing countries that use migrant workers. During 2015 we held supplier conferences in 6 countries, including the UK, to communicate our requirements to our suppliers. [] In 2016 further supplier conferences were held in 10 countries to provide further information and trainin
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 Not met: System to check if Actions are effective: The Company provided information to CHRB for this indicator, but it was not material. Evidence provided refers to audits, non-compliance and corrective actions. However, this indicator looks for evidence of a risk approach to check if action plans to mitigate the different risks are being effective. [Human Rights and Modern Slavery Statement 2020, 01/05/2020: nextplc.co.uk & CR Report 2020, 01/05/2020: nextplc.co.uk] Not met: Lessons learnt from checking effectiveness: The Company provided information to CHRB for this indicator, but it was not material [Our approach to CR 2020, N/A: nextplc.co.uk] Score 2 Not met: Both requirement under score 1 met
B.2.5	Communicating: Accounting for how human rights impacts are addressed	0.5	The individual elements of the assessment are met or not as follows: Score 1 • Met: Comms plan re identifying risks: See indicator B.2.1. The Company carries out a global risk identification and assessment process that includes both its own operations and business partners, and describes at least some features of the process. • Met: Comms plan re assessing risks: See indicator B.2.2 • Met: Comms plan re action plans for risks: See indicator B.2.3 • Not met: Comms plan re reviewing action plans: In order to be awarded this indicator, the Company has to achieve a full score in B.2.4 • Not met: Including AP suppliers: In order to be awarded this indicator, the Company has to achieve a full score in B.2.2/B.2.3/B.2.4 and at least 1,5 points in B.2.1 Score 2 • Not met: Responding to affected stakeholders concerns • Not met: Ensuring affected stakeholders can access communications

Remedies and Grievance Mechanisms

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.1	Grievance channel(s)/mec hanism(s) to receive complaints or concerns from workers	0	The individual elements of the assessment are met or not as follows: Score 1 Not met: Channel accessible to all workers: The Company has not disclosed documents containing description of whistleblowing channels/mechanisms for its own operations, nor describes how it ensures that there are appropriate channels accessible to all workers, including in local languages. Score 2 Not met: Number grievances filed, addressed or resolved Not met: Channel is available in all appropriate languages Not met: Expect AP supplier to have equivalent grievance systems Not met: Opens own system to AP supplier workers: The Company has a 'Whistleblowing policy for third parties' addressed to suppliers, contractors and business partners. In this policy the Company indicates: 'What should you report? [] A breach of NEXT's rules or policies e.g. Anti-Bribery Policy, Human Rights and Modern Slavery Policy'. However there is no reference to appropriate languages. [Whistleblowing policy for third parties, Jan 2018: nextplc.co.uk]
C.2	Grievance channel(s)/mec hanism(s) to receive complaints or concerns from external individuals and communities	0	The individual elements of the assessment are met or not as follows: Score 1 Not met: Grievance mechanism for community: According to its Whistleblowing policy for third parties this channel is only for suppliers, contractors and business partners. There is no information about a grievance mechanism for community [Whistleblowing policy for third parties, Jan 2018: nextplc.co.uk] Score 2 Not met: Describes accessibility and local languages Not met: Expects AP supplier to have community grievance systems Not met: AP supplier communities use global system
C.7	Remedying adverse impacts and incorporating lessons learned	0	The individual elements of the assessment are met or not as follows: Score 1 Not met: Describes how remedy has been provided Not met: Says how it would remedy key sector risks Score 2 Not met: Changes introduced to stop repetition Not met: Approach to learning from incident to prevent future impacts Not met: Evaluation of the channel/mechanism

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

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

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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