

PVH Feedback to 2020 Appeals Process

Thank you for taking part in the CHRB Appeals Process.

Of the 6 appeals submitted to CHRB, 3 were accepted by the CHRB and research team and 3 were rejected on the basis that the evidence provided by the Company did not meet the indicators' requirements. None were submitted for a third review to the appeals committee panel made up of six members (Margaret Wachenfeld, Peter Webster, Daniel Neale, Lise Smit, Nadia Bernaz, Tara Van Ho).

Engagement Status: Formally engaged

A summary of the appeal verdicts is set out below:

Company	Indicator code	Indicator title	CHRB Score (pre-appeal)	Final Score (Post-appeal)	Appeal Committee involved? (Yes or No)	Change in Score (Yes or No)
PVH	A.1.5	Commitment to remedy	1	1	N	N
PVH	B.1.1	Responsibility and resources for day-to-day human rights functions	1	2	N	Y
PVH	B.2.1	Identifying: Processes and triggers for identifying human rights risks and impacts	0.5	0.5	N	N
PVH	B.2.2	Assessing: Assessment of risks and impacts identified (salient risks and key industry risks)	1	2	N	Y
PVH	B.2.3	Integrating and Acting: Integrating assessment findings internally and taking appropriate action	1	2	N	Y
PVH	C.2	Grievance channels/mechanisms to	0	0	N	N

		receive complaints or concerns from external individuals and communities.				
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A summary is included below for the appeals that were rejected:

APPEAL NUMBER: 001	COMPANY: PVH
Indicator: A.1.5	Indicator Title: Commitment to remedy
<p>Excerpt from Methodology</p> <p>Score 1 The Company has a publicly available statement of policy committing it to remedy the adverse impacts on individuals, workers and communities that it has caused or contributed to.</p> <p>Score 2. The commitment also recognises this should not obstruct access to other remedies or includes collaborating in initiatives that provide access to remedy AND the commitment also includes working with business relationships to remedy adverse impacts which are directly linked to its operations, products or services through the business relationship's own mechanisms or through collaborating with those business relationships on the development of third party non-judicial remedies.</p>	
<p>Scorecard Text:</p> <p>Score 1 • Met: Commits to remedy: The Company state that 'we are committed to remedying the adverse impacts which we may have caused or contributed to.' [Approach to Corporate Responsibility and Human Rights, 2020: responsibility.pvh.com]</p> <p>Score 2 Not met: Not obstructing access to other remedies Not met: Collaborating with other remedy initiatives: The Company discloses that 'partner with third parties to assess supplier performance. Through partnership with multi-stakeholder initiatives ("MSIs") and our suppliers, the team implements capability building and remediation programs, such as Better Work and P.A.C.E.' However, no evidence about a commitment to not obstruct access to other remedies or collaborating in initiatives that provide access to remedy was found. [Approach to Corporate Responsibility and Human Rights, 2020: responsibility.pvh.com]</p> <p>Not met: Work with AP suppliers to remedy impacts: The Company discloses that 'we are committed to using our best efforts when working with our suppliers to remedy the adverse impacts on those workers and communities affected.' However, no further evidence was found in relation to remedy impacts which are directly</p>	<p>2020 Scorecard Score:</p> <p>1</p>

linked to its operations, products or services through the business relationship's own mechanisms or through collaborating with those business relationships on the development of third party non-judicial remedies. [Approach to Corporate Responsibility and Human Rights, 2020: responsibility.pvh.com]	
Requested Score: 2	Justification from Company: <i>Appeal Reasoning:</i> <p><i>We believe PVH has met two of the indicator requirements as part of A.1.5 and have outlined our support below. Team members asked about the difference between supply chain and corporate remediation during a CHRB engagement call on June 9.</i></p> <p><i>For Not Met: Collaborating with other remedy initiatives - See pg. 31 of our Supply Chain Guidelines: "PVH is dedicated to supporting the supplier's continuous improvement. PVH CR provides remediation and capability building services focused on long-term solutions created through dialogue and cooperation between management and workers. Facilities are supported through a range of services including tailored phone calls or facility visits, training customized for the facility's specific needs, or referral to expert resources. "And pg. 35 "PVH may require the factory and/or Supplier/Licensee to attend and pay for trainings conducted online or in-person. The content and length of the training will be determined by PVH in collaboration with the factory and/or Supplier/Licensee."</i></p> <p><i>For Not met: Work with AP Suppliers to remedy impacts – See pg. 2 of our Approach to CR and Human Rights: "At PVH, we identify human rights risks through our assessment program, engagement with industry groups and partnerships, and our issues management process, as well as our regular materiality assessment." And pg. 4 "An example of where we have taken action on a salient human rights issue includes our work on recruitment fees and migrant workers. As part of our CR assessment tool, we have a set of forced labor indicators, including one that specifically addresses recruitment fees. In evaluating our CR assessment data, we recognized the need to conduct a deeper dive on this issue in countries of high-risk, offer further training to our business partners, and augment our Migrant Labor Policy to provide further clarification on the definition of recruitment fees, as well as guidance on how to effectively implement management systems to ensure compliance."</i></p> <p><i>In comparison to Adidas and Gap's responses for A.1.5, we fail to see a significant enough difference in PVH's language to merit not qualifying to meet this standard and have provided these examples below from their 2020 scorecard. "The Company states that 'If an impact is occurring, Adidas will engage actively in its remediation, either directly or in cooperation with others.'" – Adidas "In its Human Rights Policy, the Company states: 'We recognize our responsibility to engage with our business partners to address and remedy adverse impacts and seek to build their capacity to respect human rights through training and engagement.'" – Gap</i></p>

Valid: 1.Yes 2.Yes	Sources from Company:					
	1. https://responsibility.pvh.com/wp-content/uploads/2020/08/PVH-CR-Supply-Chain-Guidelines.pdf 2. https://pvh.com/-/media/Files/pvh/responsibility/PVH-CR-Supply-Guidelines.pdf					
Decision	Accepted	<input type="checkbox"/>	Partially Accepted	<input type="checkbox"/>	Rejected	<input checked="" type="checkbox"/>
Justification: When considering the company request and the requirements of the indicator, the following determination was made. <u>There is no sufficient commitment to remedy, both in terms of the actual term or language used, but also evidence of processes towards remediation to meet Score 2 of A.1.5.</u> For the datapoint "Work with suppliers to remedy impacts" the Methodology requires a commitment to engage with suppliers in remedy through suppliers' mechanisms, or through third party non-judicial remedies, or for the company to provide an example of how it has been actively helping suppliers in providing remedy. For the datapoint "Collaborating with other remedy initiatives" the Methodology requires that the Company commits to collaborating with suppliers when it comes to third party initiatives that provide access to remedy. While the evidence provided by PVH demonstrates that the Company is dedicated to supporting the supplier's continuous improvement through various initiatives, giving evidence of action plans to address salient issues, it does not constitute a clear commitment to providing remedy if a negative human rights impact occurs. In addition, the evidence provided does not indicate a clear commitment to engage with third-party grievance mechanisms. The examples of statements by two other companies (Adidas and Gap) cited by PVH meet the indicator's requirements as they constitute a clear commitment to engage with third party grievance channels referring to FLW, OECD and NCPs (Adidas), and a formal commitment to work with suppliers in providing remedy (Gap).						
Indicator: A.1.5		Final Score: 1		Date: 23/03/2021		

APPEAL NUMBER: 002	COMPANY: PVH
Indicator: B.2.1	Indicator Title: Identifying: Processes and triggers for identifying human rights risks and impacts
Excerpt from Methodology	

Score 1	The Company describes the process(es) to identify its human rights risks and impacts in specific locations or activities, covering its own operations (i.e., impacts that it may cause or contribute to) AND through relevant business relationships.
Score 2.	The Company describes the global systems in place to identify its human rights risks and impacts on a regular basis across its activities, in consultation with affected or potentially affected stakeholders and internal or independent external human rights experts. This includes how the systems are triggered by new country operations, new business relationships or changes in the human rights context in particular locations.
Scorecard Text: Score 1 Met: Identifying risks in own operations: The Company indicates that 'At PVH, we identify human rights risks through our assessment program, engagement with industry groups and partnerships, and our issues management process, as well as our regular materiality assessment'. [Approach to Corporate Responsibility and Human Rights, 2020: responsibility.pvh.com] Not met: Identifying risks in AP suppliers: PVH describes that its 'factory assessment is the first step on a journey to achieve continuous improvement with our suppliers. We currently evaluate strategic raw materials suppliers and finished goods factories against comprehensive human rights and environmental criteria, with ratings based on a traffic light-like system. Factory ratings inform our sourcing decisions and remediation actions and determine the cadence for subsequent assessments. Better rated factories receive "green" or "yellow" ratings. An "orange" rating indicates that immediate action is required for the factory to maintain its authorization as a PVH supplier. If a supplier receives a "red" rating, we end our business relationship, making a responsible exit'. However, no further evidence was found about a general human rights process or system to determine risks to which suppliers are exposed generally. As the factory assessment is described it refers only to specific supplier risk. [Approach to Corporate Responsibility and Human Rights, 2020: responsibility.pvh.com] Score 2 Not met: Ongoing global risk identification: In its Approach to Corporate Responsibility document, the Company discloses that 'throughout the assessment process, we look beyond the scope of typical audits by partnering with our suppliers to address shared goals. We set expectations at the outset, conduct thorough factory inspections and solicit workers' views in confidence. We engage factory managers in an open discussion on the findings, exploring root causes, and support them in developing corrective action plans ("CAPs"). We meet with our suppliers between assessments to review their progress in implementing remediation activities and provide further guidance'. However, the evidence is about monitoring suppliers' compliance with corrective action plans. The datapoint looks for a description of system or continual process to identify risks to which the Company might be exposed. In addition, the Company reports its general risks related to apparel business in its Annual Report, but there is no description about ongoing global human rights risk identification. [Approach to Corporate Responsibility and Human Rights, 2020: responsibility.pvh.com & Annual Report 2019, 2020: pvh.com]	
2020 Scorecard Score: 0.5	

Not met: In consultation with stakeholders: PVH states that 'we share and engage with industry actors to discuss the most salient human rights issues and work on collective ways to drive systemic change. We operate a thorough issues management process, with a team dedicated to addressing and resolving human rights issues that are raised via various avenues, including issues raised by nongovernmental organizations ("NGOs"), suppliers or issue-specific media campaigns. Through our comprehensive materiality assessment process, we identify and prioritize the CR topics and issues that are most material to our business and stakeholders, in line with the GRI Standards guidelines. Following research on the wider landscape of issues that includes a review of the Sustainability Accounting Standards Board ("SASB"), the Sustainable Development Goals ("SDGs") and the Organization for Economic Co-operation and Development ("OECD"), we refresh the list of possible CR topics for each materiality assessment. We then ask PVH leadership, associates and key internal business partners to rate these topics on both the level of risk and opportunity the topic presents to PVH as a business. We also send our assessment to key external partners for review and input'. However, no evidence were found about its global systems in place to identify its human rights across its activities in consultation with affected or potentially affected stakeholders. [Approach to Corporate Responsibility and Human Rights, 2020: responsibility.pvh.com & Materiality Assessment, 2020: responsibility.pvh.com]

Met: In consultation with HR experts: The Company informs that 'in addition to our assessment process, which serves to identify actual risk(s) at the supplier level, we consult additional risk tools to further refine our risk analysis. We use ELEVATE, a service focused on inherent risk that uses data not only from our audits, but also from their entire customer base, as well as risk indices across the broader industry. This combined approach of inherent and actual risk assessment provides a comprehensive view and allows us to work to remediate possible risks before they happen'. [Approach to Corporate Responsibility and Human Rights, 2020: responsibility.pvh.com]

Not met: Triggered by new circumstances

Requested Score:

1.5

Justification from Company:

Appeal Reasoning:

We believe PVH has met two of the indicator requirements as part of B.2.1 and have outlined our support below. Team members asked about AP indicators and stakeholders during a CHRB engagement call on June 9.

For Not Met: Identifying risks in AP suppliers -- See pg. 5 of Governance and Stakeholder Engagement: "We engage with workers in our supply chain through in-depth worker interviews through our assessment process and offer a global grievance hotline available to all workers. We undertake projects in partnership with inter-governmental organizations and NGOs to address specific social and environmental issues. We work closely with peer companies and other industry participants to address industry-wide issues and work toward long-term solutions. We also engage directly with multi-stakeholder working groups globally, and in key

While PVH describes a process to monitor risks, it does not describe a process to first *identify* risks. This indicator looks for the process the Company uses to be aware of its risks both in its own operations and in its supply chain. The Kering evidence cited by PVH describes exactly that – a proactive process to identify key issues for different business segments.

In addition, the evidence provided does not describe a global system in place to identify its human rights across its activities in consultation with affected or potentially affected stakeholders. While stakeholders are consulted, such as workers in the supply chain, it is not clear whether affected stakeholders consulted as part of the risk identification process.

Indicator: B.2.1	Final Score: 0.5	Date: 23/03/2021
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APPEAL NUMBER: 003	COMPANY: PVH
Indicator: C.2	Indicator Title: Grievance channels/mechanisms to receive complaints or concerns from external individuals and communities
<p>Excerpt from Methodology</p> <p>Score 1 The Company indicates that it has one or more channel(s)/ mechanism(s), or participates in a shared mechanism, accessible to all external individuals and communities who may be adversely impacted by the Company (or individuals or organisations acting on behalf of them or who are otherwise in a position to be aware of adverse impacts) to raise complaints or concerns, including about human rights issues related to the Company, particularly in high-risk locations.</p> <p>Score 2. The Company also describes how it ensures the channel(s)/ mechanism(s) is accessible to all potentially affected external stakeholders at all operations, including in local languages.</p>	
<p>Scorecard Text:</p> <p>Score 1</p> <p>Not met: Grievance mechanism for community: PVH discloses that its 'global reporting hotline, Tell PVH, has been made available to all workers in our supply chain who receive PVH's CR assessment, and to all our global PVH associates'. Also, in its PVH tell website is informed that 'Tell PVH is a global hotline and online reporting service that allows PVH associates anywhere in the world to report conduct that is potentially illegal, unethical or inappropriate and other workplace concerns.' However, no evidence found that the grievance mechanism is accessible to all external individuals and communities who may be adversely impacted by the Company activities. [Approach to Corporate Responsibility and Human Rights, 2020: responsibility.pvh.com & Ethics point (Grievance Mechanism), 2020: secure.ethicspoint.com]</p>	<p>2020 Scorecard Score:</p> <p>0</p>

<p>Score 2</p> <p>Not met: Describes accessibility and local languages: In its feedback to CHRB, the Company provided evidence for this datapoint. However, evidence were not related to this indicator. To be awarded in this datapoint is needed that the Company describes how it ensures the channel is accessible to all potentially affected external stakeholders at all operations, including in local languages. The evidence provides were about allegations and that the mechanisms are open for suppliers. [Approach to Corporate Responsibility and Human Rights, 2020: responsibility.pvh.com & Business & Human Rights Resource Center response, 2020: business-humanrights.org]</p> <p>Not met: Expects AP supplier to have community grievance systems</p> <p>Not met: AP supplier communities use global system</p>	
<p>Requested Score:</p> <p>1</p>	<p>Justification from Company:</p> <p><i>Appeal Reasoning:</i></p> <p><i>We believe PVH has met one of the indicator requirements as part of B.1.1 and have outlined our support below. Team members asked about Grievance processes during a CHRB engagement call on June 9.</i></p> <p><i>For Not Met: Describes accessibility and local languages – See pg. 39 of our CR Report: “Our stakeholders include: Associates, investors, suppliers, workers in our supply chain, nongovernmental organizations (“NGOs”), industry associations and multi-stakeholder initiatives, labor unions, governments, communities, wholesale accounts and consumers. Tell PVH acts as a channel for PVH to capture and address concerns or complaints raised by the people who work for us directly and indirectly in our supply chain. Workers and associates, subject to certain legal limitations, can report any suspected policy violations, inappropriate behaviour and unethical practices via the hotline. In the majority of cases, they can make reports anonymously, either online or by telephone, in one of 15 languages. We provide regular updates to the associate or worker concerned, who can also track the progress of the complaint online.” And please see PVH’s Investor Relations page, which is publicly available: “You may also report potential misconduct through the Company’s ethics hotline and website, Tell PVH, at tellpvh.ethicspoint.com. Reports may be made online or via the telephone in fourteen languages, anonymously, except as prohibited by law and will be kept confidential to the extent possible.”</i></p>
<p>Valid:</p> <p>1.No 2.Yes</p>	<p>Sources from Company:</p> <ol style="list-style-type: none"> 1. https://responsibility.pvh.com/wp-content/uploads/2020/07/PVH-2019-CR-Report.pdf 2. https://www.pvh.com/investor-relations/governance/code-of-conduct

Decision	Accepted	<input type="checkbox"/>	Partially Accepted	<input type="checkbox"/>	Rejected	<input checked="" type="checkbox"/>	
Justification: <p>When considering the company request and the requirements of the indicator, the following determination was made.</p> <p><u>There is no sufficient evidence for the company to meet the Score 2 requirement for C.2 as it is unclear whether PVH's grievance mechanism is open to external ,individuals and communities who may be adversely impacted by the Company.</u></p> <p><u>In addition, PVH's Corporate Responsibility Report provided in appeals evidence is not included in feedback provided by the Company on this indicator during the second review phase, and is therefore not valid for review during the appeals process. However, even taking the Report's content into account, the company still did not meet the requirement under Score 2 of C.2.</u></p> <p>In order to meet the requirements under Score 2 of indicator C.2, a Company needs to describe how it ensures the channel(s)/ mechanism(s) is accessible to <i>all potentially affected external stakeholders</i> at all operations, including in local languages.</p> <p>While the evidence provided by PVH indicates that stakeholders could report in one of 15 languages. It remains unclear if these stakeholders include external individuals and communities who may be adversely impacted by the Company (or individuals or organisations acting on behalf of them or who are otherwise in a position to be aware of adverse impacts). In order to meet this requirement, PVH needs to clarify if anyone that is not an associate or part of the supply chain can make a complaint, including in local languages.</p>							
Indicator: C.2		Final Score: 0		Date: 23/03/2021			

As a result of the accepted appeals, PVH's overall score has increased by 3 points, giving the Company an overall score of 14.5/26:

PVH	Governance and policy commitments (8 points)	Embedding respect and human rights due diligence (12 points)	Remedies and grievance mechanisms (6 points)	Total (26 points)
2020 Core UNGP Score	6.5/8	3.5/12	1.5/6	11.5/26
After Appeal	6.5/8	6.5/12	1.5/6	14.5/26
Change	No	Yes	No	Yes

Once CHRB has replied in detail to all companies we will update the table online as well as the downloadable data sheets.

Corporate Human Rights Benchmark 2020 Company Scoresheet

Company Name PVH Corporation
Industry Apparel (Supply Chain only)
UNGP Core Score (*) 11.5 out of 26

Score	Out of	For indicators
Governance and Policy Commitments		
2	2	A.1.1 Commitment to respect human rights
1.5	2	A.1.2 Commitment to respect the human rights of workers
2	2	A.1.4 Commitment to engage with stakeholders
1	2	A.1.5 Commitment to remedy
Embedding respect and Human Rights Due Diligence		
Embedding respect		
1	2	B.1.1 Embedding - Responsibility and resources for day-to-day human rights functions
Human Rights Due Diligence (HRDD)		
0.5	2	B.2.1 HRDD - Identifying: Processes and triggers for identifying human rights risks and impacts
1	2	B.2.2 HRDD - Assessing: Assessment of risks and impacts identified (salient risks and key industry risks)
1	2	B.2.3 HRDD - Integrating and Acting: Integrating assessment findings internally and taking appropriate action
0	2	B.2.4 HRDD - Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts
0	2	B.2.5 HRDD - Reporting: Accounting for how human rights impacts are addressed
Remedies and Grievance Mechanisms		
1.5	2	C.1 Grievance channels/mechanisms to receive complaints or concerns from workers
0	2	C.2 Grievance channels/mechanisms to receive complaints or concerns from external individuals and communities
0	2	C.7 Remedying adverse impacts and incorporating lessons learned
11.5	26	

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

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

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

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

Detailed assessment

Governance and Policies

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1.1	Commitment to respect human rights	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Met: UNGC principles 1 & 2: The Company discloses that 'as members of the UN Global Compact, we continued to support this critical initiative and remain dedicated to practicing sustainable and socially responsible policies, while also providing transparency on how they are being implemented'. The Company is a signatory of UN Global Compact since 2016. [Corporate Responsibility Report 2018, 2018: responsibility.pvh.com & UN Global Compact, 03/2020: unglobalcompact.org] <p>Score 2</p> <ul style="list-style-type: none"> Met: UNGPs: The Company discloses that 'is committed to respecting human rights, and supports the ten principles of the UN Global Compact and the UN Guiding Principles on Business and Human Rights'. This statement is signed by the Chairman & CEO. [A Shared Commitment, 2020: responsibility.pvh.com]
A.1.2	Commitment to respect the human rights of workers	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Met: UNGC principles 3-6: The Company states that 'PVH Corp. Is committed to respecting human rights, and supports the ten principles of the UN Global Compact'. [Living Wage Strategy, 03/2020: responsibility.pvh.com & A Shared Commitment, 2020: responsibility.pvh.com] Met: Explicitly list ALL four ILO for AP suppliers: The Company explicitly commits to the following: non-discrimination, forced labor, child labor and freedom of association and collective bargain. With respect the last two, the Company indicates: 'Our business partners are required to recognize and respect the right of their employees to freedom of association and collective bargaining. Employees should be free to join organizations of their choice.' These were explicitly stated as core values on the Company's 'Shared commitment' document. [A Shared Commitment, 2019: responsibility.pvh.com] <p>Score 2</p> <ul style="list-style-type: none"> Not met: Explicit commitment to All four ILO Core: The Company explicitly commits to the following: non-discrimination, forced labor, child labor and freedom of association were explicitly stated as core values of the Company's Code of Conduct. However, the Company only regarding to collective bargaining it seems to refer only to business partners. In the document 'Approach to CR and Human Rights' the Company encompasses 10 standards which do not include collective bargaining. Additionally, the Company discloses (Annual report 2019) that 'Approximately 2% of our employees were represented for the purpose of collective bargaining by four different unions in the United States. Additional persons, some represented by these four unions, are employed from time to time based upon our manufacturing schedules and retailing seasonal needs. Our collective bargaining agreements generally are for three-year terms. In some international markets, a significant percentage of employees are covered by governmental labor arrangements. We believe that our relations with our employees are good'. However, this statement does not include an explicit commitment to respect the employees' right to bargain collectively. [A Shared Commitment, 2020: responsibility.pvh.com & Approach to Corporate Responsibility and Human Rights, 2020: responsibility.pvh.com] Met: Respect H&S of workers: PVH discloses in its CR report 2019 that 'Nothing is more important to us than our people, and our priority is the health, safety and wellbeing of our associates [employees]'. Also that 'We work to provide our associates with safe working environments, as well as initiatives and benefits that promote health and wellbeing and foster a positive work-life balance'. [Corporate Responsibility Report 2019, 2020: responsibility.pvh.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Met: H&S applies to AP suppliers: The Company states that 'Our business partners must provide a safe and healthy workplace designed and maintained to prevent accidents, illness and injury attributable to the work performed or the operation of the facility and machinery. In doing so, our business partners must comply with all national laws, regulations and best practices concerning health and safety in the workplace, as well as provide all required and appropriate workers compensation coverage in the event of injury or fatality'. [CR Supplier Guidelines, 01/2020: responsibility.pvh.com] • Not met: working hours for workers: The Company informs that 'A Shared Commitment is our code of conduct, which represents our commitment to our associates and applies to our business partners, including suppliers, contractors, vendors, licensees and agents.' In it, PVH states that 'Our business partners are prohibited from requiring their employees to work more than the regular and overtime hours permitted under the law of the country where they are employed. In no circumstance may regular hours exceed 48 hours in a week and, other than in exceptional circumstances, the sum of regular and overtime hours in a week cannot exceed 60 hours. Employees must have at least 24 consecutive hours of rest in every seven-day period. Our business partners are not permitted to request overtime on a regular basis. All overtime must be consensual and compensated at a premium rate'. However, this specific statement related to working hours explicitly refers only to business partners, it is not clear if this also applies to own associates (employees). [A Shared Commitment, 2020: responsibility.pvh.com] • Met: Working hours for AP suppliers: As indicated above, PVH states that 'Our business partners are prohibited from requiring their employees to work more than the regular and overtime hours permitted under the law of the country where they are employed. In no circumstance may regular hours exceed 48 hours in a week and, other than in exceptional circumstances, the sum of regular and overtime hours in a week cannot exceed 60 hours. Employees must have at least 24 consecutive hours of rest in every seven-day period. Our business partners are not permitted to request overtime on a regular basis. All overtime must be consensual and compensated at a premium rate'. [CR Supplier Guidelines, 01/2020: responsibility.pvh.com & A Shared Commitment, 2020: responsibility.pvh.com]
A.1.4	Commitment to engage with stakeholders	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Commits to stakeholder engagement: PVH states in its Code of Conduct that 'Ongoing engagement with our key stakeholders around the world to improve and monitor our approach to human rights and the environment is an ideal to which we are committed'. [A Shared Commitment, 2020: responsibility.pvh.com] • Met: Regular stakeholder engagement: The Company states that 'we engage with our stakeholders in ways that best address their inquiry, support our shared goals and leverage best practices and stakeholder guidance.' Its engagement includes: 'we regularly engage with our associates through events, trainings and internal communications, as well as social media, to embed CR throughout our business', 'we engage with workers in our supply chain through in-depth worker interviews through our assessment process, and we offer a global grievance hotline available to all workers in our supply chain.' It also says 'we partner with labor unions through direct engagement, bi-partite relationships, and multi-stakeholder forums on initiatives that impact the workers in our supply chain.' [Materiality and Stakeholder Engagement, 03/2020: responsibility.pvh.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Commits to engage stakeholders in design: The Company states that 'we are committed to engaging with relevant and affected stakeholders and their legitimate representatives on an ongoing basis. We actively worked with our stakeholders in the development and design of our Forward Fashion (CR strategy) strategy and continue to do so as we further develop, monitor and amend our approach to human rights and develop our CR program. We proactively solicit representatives from our business partners, multi-stakeholder associations, non-governmental organizations ("NGOs"), intergovernmental organizations, worker representatives, governments and our peers for input, counsel and ongoing partnerships. We always communicate openly and seek out their interests, concerns and suggestions'. [CR Governance and Stakeholder engagement, 2020: responsibility.pvh.com]
A.1.5	Commitment to remedy	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Commits to remedy: The Company state that 'we are committed to remedying the adverse impacts which we may have caused or contributed to.' [Approach to Corporate Responsibility and Human Rights, 2020: responsibility.pvh.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> • Not met: Not obstructing access to other remedies • Not met: Collaborating with other remedy initiatives: The Company discloses that 'partner with third parties to assess supplier performance. Through partnership with multi-stakeholder initiatives ("MSIs") and our suppliers, the team implements capability building and remediation programs, such as Better Work and P.A.C.E.' However, no evidence about a commitment to not obstruct access to other remedies or collaborating in initiatives that provide access to remedy was found. [Approach to Corporate Responsibility and Human Rights, 2020: responsibility.pvh.com] • Not met: Work with AP suppliers to remedy impacts: The Company discloses that 'we are committed to using our best efforts when working with our suppliers to remedy the adverse impacts on those workers and communities affected.' However, no further evidence was found in relation to remedy impacts which are directly linked to its operations, products or services through the business relationship's own mechanisms or through collaborating with those business relationships on the development of third party non-judicial remedies. [Approach to Corporate Responsibility and Human Rights, 2020: responsibility.pvh.com]

Embedding Respect and Human Rights Due Diligence

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.1	Responsibility and resources for day-to-day human rights functions	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Commits to ILO core conventions: See indicator A.1.2. The Company is signatory to the UN Global Compact. • Met: Senior responsibility for HR: The Company informs in its Corporate responsibility governance that 'Our Senior Management Team, led by our Chairman and CEO Emanuel Chirico, establish and uphold our vision and has final accountability for the implementation of Forward Fashion and its 15 priorities areas, including our management of human rights and environmental practices across our value chain. The CR Committee of the PVH Board of Directors provides support and guidance to our Senior Management Team and reports to the broader Board of Directors with respect to our CR policies and strategies. The CR Committee, which consists of three independent directors, meets four times a year to monitor our CR performance and progress across social, environmental, human rights and community-focused key performance indicators ("KPIs") that are established annually to advance the program's commitments. Every meeting includes updates on current issues, program updates, and discussion and committee approvals of any strategy updates or new partnerships/initiatives.' [CR Governance and Stakeholder engagement, 2020: responsibility.pvh.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Day-to-day responsibility: The Company details that 'Our Senior Vice President of CR, Marissa Pagnani McGowan, manages the development and implementation of our global CR strategy, including our human rights, environmental, and health and safety commitments and policies. She reports to our Chief Risk Officer.' However, no details were found how the Senior Vice President of CR, conducts business and work within her functions to implement or supervise human rights on a day-to-day basis. [CR Governance and Stakeholder engagement, 2020: responsibility.pvh.com] • Not met: Day-to-day responsibility for AP in supply chain: The Company informs that 'Our corporate and regional teams collaborate to manage our social and environmental assessment programs. We partner very closely with the PVH Supply team to design and implement all components of our program. Together, the CR and Supply teams' partner with suppliers to ensure adherence to the human rights, labor rights and environmental standards in our code of conduct – a requirement of all of our business partners'. However, no description about how is allocated the day-to-day responsibility for managing human rights issues within its supply chain was found. [CR Governance and Stakeholder engagement, 2020: responsibility.pvh.com]
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"> • Met: Identifying risks in own operations: The Company indicates that 'At PVH, we identify human rights risks through our assessment program, engagement with industry groups and partnerships, and our issues management process, as well as our regular materiality assessment'. [Approach to Corporate Responsibility and Human Rights, 2020: responsibility.pvh.com]

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			<ul style="list-style-type: none"> • Not met: Identifying risks in AP suppliers: PVH describes that its 'factory assessment is the first step on a journey to achieve continuous improvement with our suppliers. We currently evaluate strategic raw materials suppliers and finished goods factories against comprehensive human rights and environmental criteria, with ratings based on a traffic light-like system. Factory ratings inform our sourcing decisions and remediation actions and determine the cadence for subsequent assessments. Better rated factories receive "green" or "yellow" ratings. An "orange" rating indicates that immediate action is required for the factory to maintain its authorization as a PVH supplier. If a supplier receives a "red" rating, we end our business relationship, making a responsible exit'. However, no further evidence was found about a general human rights process or system to determine risks to which suppliers are exposed generally. As the factory assessment is described it refers only to specific supplier risk. [Approach to Corporate Responsibility and Human Rights, 2020: responsibility.pvh.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Ongoing global risk identification: In its Approach to Corporate Responsibility document, the Company discloses that 'throughout the assessment process, we look beyond the scope of typical audits by partnering with our suppliers to address shared goals. We set expectations at the outset, conduct thorough factory inspections and solicit workers' views in confidence. We engage factory managers in an open discussion on the findings, exploring root causes, and support them in developing corrective action plans ("CAPs"). We meet with our suppliers between assessments to review their progress in implementing remediation activities and provide further guidance'. However, the evidence is about monitoring suppliers' compliance with corrective action plans. The datapoint looks for a description of system or continual process to identify risks to which the Company might be exposed. In addition, the Company reports its general risks related to apparel business in its Annual Report, but there is no description about ongoing global human rights risk identification. [Approach to Corporate Responsibility and Human Rights, 2020: responsibility.pvh.com & Annual Report 2019, 2020: pvh.com] • Not met: In consultation with stakeholders: PVH states that 'we share and engage with industry actors to discuss the most salient human rights issues and work on collective ways to drive systemic change. We operate a thorough issues-management process, with a team dedicated to addressing and resolving human rights issues that are raised via various avenues, including issues raised by non-governmental organizations ("NGOs"), suppliers or issue-specific media campaigns. Through our comprehensive materiality assessment process, we identify and prioritize the CR topics and issues that are most material to our business and stakeholders, in line with the GRI Standards guidelines. Following research on the wider landscape of issues that includes a review of the Sustainability Accounting Standards Board ("SASB"), the Sustainable Development Goals ("SDGs") and the Organization for Economic Co-operation and Development ("OECD"), we refresh the list of possible CR topics for each materiality assessment. We then ask PVH leadership, associates and key internal business partners to rate these topics on both the level of risk and opportunity the topic presents to PVH as a business. We also send our assessment to key external partners for review and input'. However, no evidences were found about its global systems in place to identify its human rights across its activities in consultation with affected or potentially affected stakeholders. [Approach to Corporate Responsibility and Human Rights, 2020: responsibility.pvh.com & Materiality Assessment, 2020: responsibility.pvh.com] • Met: In consultation with HR experts: The Company informs that 'in addition to our assessment process, which serves to identify actual risk(s) at the supplier level, we consult additional risk tools to further refine our risk analysis. We use ELEVATE, a service focused on inherent risk that uses data not only from our audits, but also from their entire customer base, as well as risk indices across the broader industry. This combined approach of inherent and actual risk assessment provides a comprehensive view and allows us to work to remediate possible risks before they happen'. [Approach to Corporate Responsibility and Human Rights, 2020: responsibility.pvh.com] • Not met: Triggered by new circumstances

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B.2.2	Assessing: Assessment of risks and impacts identified (salient risks and key industry risks)	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Salient risk assessment (and context): The Company discloses that 'looked at the most rigorous frameworks available and incorporated advice from the OECD, SASB and the UN Guiding Principles on Business and Human Rights into our target setting. Human rights was identified as the number one material risk for PVH in our 2018 materiality assessment. We discussed the boundaries of our past work and included these findings and the provided stakeholder input into our Forward Fashion CR strategy, which sets seven human rights-specific priorities mapped to time-bound targets'. However, no further information about how relevant factors are taken into account to determine human rights issues saliency, such as geographical, economic, social and other factors. [Approach to Corporate Responsibility and Human Rights, 2020: responsibility.pvh.com] • Met: Public disclosure of salient risks: The Company informs that its 'human rights risks most critical are: Expanding the application of PVH's social and environmental standards to the manufacturing of all products and materials; Improving working environments through worker engagement and representation; Ensuring safe and healthy workplaces for all workers in our supply chain; Creating the conditions for national living wage agreements through industry-wide collective bargaining linked to our purchasing practices; Partnering with suppliers to ensure ethical recruitment practices for migrant workers; Removing barriers to advancement and create pathways to opportunity and choice for women in our supply chain; Creating an inclusive environment where every individual is valued; Developing a talented and skilled workforce that embodies PVH's values and an entrepreneurial spirit, while empowering associates to design their future; Supporting the needs of women and children around the world by creating safe spaces, improving access to education and enhancing quality of life. [Approach to Corporate Responsibility and Human Rights, 2020: responsibility.pvh.com] <p>Score 2</p> <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	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: Action Plans to mitigate risks: The Company states that 'Our Forward Fashion strategy is built around taking action to prevent, mitigate and remediate human rights risks. Each Forward Fashion priority has a time-bound target to hold us accountable as we aim to reach a set level of impact. To achieve each target, we have rigorous global action plans in place to work across the company and our businesses, and with supplier partners on the ground'. [Approach to Corporate Responsibility and Human Rights, 2020: responsibility.pvh.com & CR Governance and Stakeholder engagement, 2020: responsibility.pvh.com] • Met: Including in AP supply chain: See above. [Approach to Corporate Responsibility and Human Rights, 2020: responsibility.pvh.com & CR Governance and Stakeholder engagement, 2020: responsibility.pvh.com] • Met: Example of Actions decided: The Company informs that 'An example of where we have taken action on a salient human rights issue includes our work on recruitment fees and migrant workers. As part of our CR assessment tool, we have a set of forced labor indicators, including one that specifically addresses recruitment fees. In evaluating our CR assessment data, we recognized the need to conduct a deeper dive on this issue in countries of high-risk, offer further training to our business partners, and augment our Migrant Labor Policy to provide further clarification on the definition of recruitment fees, as well as guidance on how to effectively implement management systems to ensure compliance. We similarly recognized the need to engage with industry experts such as the RLI, where PVH serves as a member of the Steering Committee, and provide strategic direction to the organization as it works to ensure that the rights of workers who are vulnerable to forced labor in global supply chains are consistently respected and promoted. [Approach to Corporate Responsibility and Human Rights, 2020: responsibility.pvh.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met

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B.2.4	Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: System to check if Actions are effective: PVH informs that 'As detailed in the Corporate Responsibility Supply Chain Guidelines in the Initial Factory Engagement Workflow, immediately after an audit (referred to as an "assessment" by PVH), any discovered non-compliances result in a CAP with draft findings of non-compliance issues. A final CAP (with detailed root cause evaluation, timelines for completion, responsible parties, etc.) is developed by the factory and provided to PVH's CR team within 14 calendar days and within 30 calendar days for licensees, unless otherwise specified after the assessment. Our CR team will approve the final CAP via email, while suppliers are expected to address all identified non-compliance issues, with priority given to address the most serious issues first. Progress or completion of issues identified as "Critical – Immediate Action" must be immediately communicated to PVH CR representatives within seven business days after assessment. Completion of other corrective actions is verified during re-evaluation assessments and/ or through regular communication and contact with the supplier'. Also, in its Corporate Responsibility Report 2019, PVH discloses about an overview of its CR Supply Chain assessments. Although the Company describes actions taken in response to human rights non-compliances found in its suppliers, a description about a system for tracking the actions taken in response to human rights risks and impacts from a risk-based perspective, and the evaluation whether the actions have been effective or not in its own operations was not found. [Approach to Corporate Responsibility and Human Rights, 2020: responsibility.pvh.com & Corporate Responsibility Report 2019, 2020: responsibility.pvh.com] • Not met: Lessons learnt from checking effectiveness <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirement under score 1 met
B.2.5	Communicating : Accounting for how human rights impacts are addressed	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Comms plan re identifying risks: In order to be awarded this indicator, the Company needs to achieve at least 1,5 points in B.2.1 • Not met: Comms plan re assessing risks: In order to be awarded this indicator, the Company has to achieve a full score in B.2.2 • Not met: Comms plan re action plans for risks: In order to be awarded this indicator, the Company has to achieve a full score in B.2.3 • Not met: Comms plan re reviewing action plans: In order to be awarded this indicator, the Company has to achieve a full score in B.2.4 • Not met: Including AP suppliers: In order to be awarded this indicator, the Company has to achieve a full score in B.2.2/B.2.3/B.2.4 and at least 1,5 points in B.2.1 <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Responding to affected stakeholders concerns: The Company informs about a corrective action plan (CAP) with draft findings of non-compliance issues. The final corrective action plan (CAP) (with detailed root cause evaluation, timelines for completion, responsible parties, etc.) should be developed by the factory and provided to PVH CR within 14 calendar days and within 30 calendar days for licensees, unless otherwise specified after the assessment. PVH CR will approve final CAP via email. However, no further details was found about how PVH respond to specific human rights concerns raised by affected stakeholders. [CR Supplier Guidelines, 01/2020: responsibility.pvh.com] • Not met: Ensuring affected stakeholders can access communications: The Company discloses that 'actively worked with our stakeholders in the development and design of our Forward Fashion strategy and continue to do so as we further develop, monitor and amend our approach to human rights and develop our CR program. We proactively solicit representatives from our business partners, multi-stakeholder associations, non-governmental organizations ("NGOs"), intergovernmental organizations, worker representatives, governments and our peers for input, counsel and ongoing partnerships. We always communicate openly and seek out their interests, concerns and suggestions. We appreciate that our continuous engagement helps us gain valuable insights that enable the strengthening and evolution of our program for greater impact, and are always looking for new and better ways to engage to ensure that we leverage their diverse perspectives and expertise'. However, no further details was found about how the Company ensures that the affected or potentially affected stakeholders are able to access these communications. [CR Governance and Stakeholder engagement, 2020: responsibility.pvh.com]

Remedies and Grievance Mechanisms

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.1	Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Met: Channel accessible to all workers: The Company discloses in its Corporate Responsibility Report that 'Associates and workers can report any suspected policy violations, inappropriate behavior, and unethical practices via Tell PVH, our global reporting hotline. Since 2017, our global reporting hotline, Tell PVH, is open to all workers in our supply chain, in addition to PVH associates'. [Corporate Responsibility Report 2018, 2018: responsibility.pvh.com] <p>Score 2</p> <ul style="list-style-type: none"> Not met: Number grievances filed, addressed or resolved: The Company informs that 'had 18 supply chain grievances in 2019: 8 from Tell PVH, 8 from workers, and 2 from unions. All are considered resolved.' However, it is not clear how many of these were human rights-related grievances. [Corporate Responsibility Report 2019, 2020: responsibility.pvh.com] Met: Channel is available in all appropriate languages: The Company discloses that 'workers and associates, subject to certain legal limitations, can report any suspected policy violations, inappropriate behavior and unethical practices via the hotline. In the majority of cases, they can make reports anonymously, either online or by telephone, in one of 15 languages'. Also, in its Tell PVH website, the complaints can be made in 17 languages within phone numbers that covers 71 countries. [Corporate Responsibility Report 2019, 2020: responsibility.pvh.com] Met: Expect AP supplier to have equivalent grievance systems: The Company discloses in its CSR Suppliers Guidelines that an example of best practices from suppliers is to 'implement a worker hotline that can handle sensitive grievances such as harassment and abuse. The hotline should allow workers the ability to file a grievance anonymously if so desired'. [CR Supplier Guidelines, 01/2020: responsibility.pvh.com] Met: Opens own system to AP supplier workers: The Company states that 'since 2017, our global reporting hotline, Tell PVH, is open to all workers in our supply chain, in addition to PVH associates. It acts as a channel for PVH to capture and address concerns or complaints raised by the people who work for us directly and indirectly in our supply chain'. [Corporate Responsibility Report 2018, 2018: responsibility.pvh.com]
C.2	Grievance channel(s)/mechanism(s) to receive complaints or concerns from external individuals and communities	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Not met: Grievance mechanism for community: PVH discloses that its 'global reporting hotline, Tell PVH, has been made available to all workers in our supply chain who receive PVH's CR assessment, and to all our global PVH associates'. Also, in its PVH tell website is informed that 'Tell PVH is a global hotline and online reporting service that allows PVH associates anywhere in the world to report conduct that is potentially illegal, unethical or inappropriate and other workplace concerns.' However, no evidence found that the grievance mechanism is accessible to all external individuals and communities who may be adversely impacted by the Company activities. [Approach to Corporate Responsibility and Human Rights, 2020: responsibility.pvh.com & Ethics point (Grievance Mechanism), 2020: secure.ethicspoint.com] <p>Score 2</p> <ul style="list-style-type: none"> Not met: Describes accessibility and local languages: In its feedback to CHRB, the Company provided evidence for this datapoint. However, evidences were not related to this indicator. To be awarded in this datapoint is needed that the Company describes how it ensures the channel is accessible to all potentially affected external stakeholders at all operations, including in local languages. The evidence provides were about allegations and that the mechanisms are open for suppliers. [Approach to Corporate Responsibility and Human Rights, 2020: responsibility.pvh.com & Business & Human Rights Resource Center response, 2020: business-humanrights.org] 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	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Not met: Describes how remedy has been provided: The Company describes an example about a remediate related to health and safety issues 'in the Bangladeshi garment industry, some participants in which are PVH business partners. April 2020 marked the seventh anniversary of the Rana Plaza disaster in Bangladesh. While we had no production there, we have worked tirelessly to ensure such a tragedy will never happen again. In the wake of the Rana Plaza building collapse in 2013, we

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			<p>became founding members of the Accord to help stop further tragedies and develop a culture of health and safety in garment factories. The Accord is a legally binding commitment to improve fire and building safety in Bangladesh [...]Through the Accord, we collaborate with multiple stakeholders to identify and address fire, electrical and structural risks, and drive positive change. Importantly, we recognize the pressing need to empower workers to formally voice their health and safety concerns with factory managers. In factories producing goods for PVH, we both assess our suppliers and coordinate safety improvement efforts on behalf of our fellow Accord members purchasing from those factories'. However, this indicator looks for evidence of how actual remedy has been provided to victims as consequence of the Company's impact or activities. [Approach to Corporate Responsibility and Human Rights, 2020: responsibility.pvh.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Changes introduced to stop repetition • Not met: Evaluation of the channel/mechanism

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
E(1).0	Serious allegation No 1		<ul style="list-style-type: none"> • Headline: Report finds female migrant workers are subjected to conditions of modern slavery in factories supplying to many brands • Area: Forced labour - restriction of movement • Story: On February 28, 2018, the Business & Human Rights Resource Centre website reported that according to a study conducted by the India Committee of the Netherlands, Clean Clothes Campaign and Garment Labour Union, that looks into the living conditions in Bangalore garment factory hostels and the particular challenges migrant workers face. It is found that five out of the eleven ILO (International Labour Organization) indicators for forced labour exists in the Bangalore garment industry: abuse of vulnerability, deception as a result of false promises (wages etc.), restriction of movement in the hostel, intimidation and threats, and abusive working and living conditions. The report identifies Company 1 as supplying a number of major fashion brands, including Calvin Klein & Tommy Hilfiger (PVH). Connected to this Company 1 are 'hostels', living quarters for workers located nearby the factory they work at. Women who lived at these hostels complained that their movement was restricted by the factory employees and hostel authorities. At Company 1 the women were escorted from the factory back to the hostel in the afternoon and were banned from leaving the hostel during weekday evenings. On Sunday's they were allowed to leave the hostel unaccompanied, however this was only between the hours of 4pm to 7pm. While some of these aspects are also felt by the local workforce, they are more strongly experienced by migrant workers. According to the report, the factories studied produce for C&A, Columbia, Decathlon, Gap, H&M, PVH, Marks & Spencer, Abercrombie & Fitch, Benetton and Levi Strauss. • Sources: [Business & Human Rights Resource Centre - 28/02/2018: business-humanrights.org][Clean Clothes Campaign - 26/01/2018: cleanclothes.org]
E(1).1	The Company has responded publicly to the allegation	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: Public response available: The company provides a response on the BHRRC website. [PVH response to ICN allegations (BHRRC), 27/02/2018: https://www.business-humanrights.org/Response_Business and Human Rights Resource Center_ICN_20180227.pdf] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Response goes into detail: The company provides a lengthy response however it fails to address the specific allegations raised, "PVH's assessment tool and current supplier guidelines address all categories of violations alleged in the report which are monitored in our regular assessment program. Furthermore, we continue to build upon our assessment program and are focused on moving beyond compliance, partnering with our suppliers to better understand the root causes of recurring issues and build their capacity to better manage noncompliance issues". The company does note that "Also, PVH will engage with the other apparel companies named to be sourcing from Company 1 to ensure coordinated efforts to address the findings raised". However this is insufficient detail to receive a score. [PVH response to ICN allegations (BHRRC), 27/02/2018: https://www.business-humanrights.org/Response_Business and Human Rights Resource Center_ICN_20180227.pdf]

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E(1).2	The Company has appropriate policies in place	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Company policies address the general issues raised: The company's supplier policy 'A Shared Commitment' says "Our business partners are prohibited from utilizing forced labor, whether in the form of prison labor, indentured labor, bonded labor or otherwise. Mental and physical coercion, slavery and human trafficking are prohibited throughout our supply chain". It also states that "Our Code is informed by the United Nation's Universal Declaration of Human Rights and is based on the Core Conventions of the International Labour Organization (ILO)". [Corporate Responsibility Report 2018, 2018: responsibility.pvh.com & A Shared Commitment, 2018] • Met: Policies apply to the type of business relationships involved: The company has 'A Shared Commitment' code, outlining the expectations for suppliers and other business partners, which states "This code is of utmost importance to PVH Corp. and embodies our commitment to the workers who manufacture our products and their communities. Adherence to the human and labor rights standards in this code by those who seek to do business with us, and by their business partners in our supply chain, is a prerequisite for establishing or continuing a relationship with our company." [A Shared Commitment, 2018] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Policies address the specific rights in question: The Company indicates in its Supplier Guidelines that business partners/suppliers cannot deduct from workers' wages, costs or fees associated with employment eligibility such as health check, employment registration, work permits or recruitment agency fees... Additionally the Company states its suppliers cannot restrict free movement of workers. "DO NOT require workers to live in factory owned or controlled residences. (...) DO NOT impose unreasonable curfews in dormitories that restrict the movement of workers during their leisure time." [A Shared Commitment, 2018 & CR Supplier Guidelines, 01/2020: responsibility.pvh.com]
E(1).3	The Company has taken appropriate action	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Engages with affected stakeholders: The company said "We are in contact with ICN and Civep to determine any appropriate next steps. Additionally, in order to ensure that these matters are addressed in a collective manner, we are in touch with the other apparel companies named as sourcing from this vendor." However, there is no evidence that the company engaged with the women themselves or with similar type -(women in the same working and living conditions in the same region) [PVH response to ICN allegations (BHRRC), 27/02/2018: https://business-humanrights.org Response_Business and Human Rights Resource Center_ICN_ 20180227.pdf] • Met: Encourages linked business to engage affected stakeholders: The company said "PVH will reiterate its expectations to vendors through our capacity building efforts in the region specifically around forced labor, harassment, wages and freedom of movement in upcoming engagements. Also, PVH will engage with the other apparel companies named to be sourcing from Company 1 to ensure coordinated efforts to address the findings raised. [PVH response to ICN allegations (BHRRC), 27/02/2018: https://business-humanrights.org Response_Business and Human Rights Resource Center_ICN_ 20180227.pdf] • Met: Provides remedies to affected stakeholders: The company said "While PVH respects ICN and Civep's position not to disclose factory names, it can be challenging to effectively remediate the issues raised without such information." Therefore CHRB awards this points because the company cannot provide remedy to those women whose identity is unknown [PVH response to ICN allegations (BHRRC), 27/02/2018: https://business-humanrights.org Response_Business and Human Rights Resource Center_ICN_ 20180227.pdf] • Not met: Has reviewed management systems to prevent recurrence: The company says "PVH's assessment tool and current supplier guidelines address all categories of violations alleged in the report which are monitored in our regular assessment program. Furthermore, we continue to build upon our assessment program and are focused on moving beyond compliance, partnering with our suppliers to better understand the root causes of recurring issues and build their capacity to better manage noncompliance issues." However this doesn't identify any specific actions that have been undertaken in the wake of the allegations raised. [PVH response to ICN allegations (BHRRC), 27/02/2018: https://business-humanrights.org Response_Business and Human Rights Resource Center_ICN_ 20180227.pdf]

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			<p>Score 2</p> <ul style="list-style-type: none"> • Met: Remedies are satisfactory to the victims: The company said "While PVH respects ICN and Cividep's position not to disclose factory names, it can be challenging to effectively remediate the issues raised without such information." Therefore CHRB awards this points because the company cannot provide remedy to those women whose identity is unknown [PVH response to ICN allegations (BHRRC), 27/02/2018: https://business-humanrights.org/Response_Business and Human Rights Resource Center_ICN_20180227.pdf] • Not met: Has improved systems and engaged affected stakeholders: The company says "We continue to build upon our assessment program and are focused on moving beyond compliance, partnering with our suppliers to better understand the root causes of recurring issues and build their capacity to better manage noncompliance issues. PVH will continue its efforts to deliver training on working conditions, management systems and employment practices, share practical strategies, and support our vendors in the region to better manage human rights risk in their factories". However this doesn't provide any specific details about what improvements have been undertaken in PVH's systems, nor does the company elaborate on the types of engagement it has had with ICN or the other companies named in the report as sourcing from Company 1. [PVH response to ICN allegations (BHRRC), 27/02/2018: https://business-humanrights.org/Response_Business and Human Rights Resource Center_ICN_20180227.pdf]
E(2).0	Serious allegation No 2		<ul style="list-style-type: none"> • Headline: Investigation reveals 'numerous' labour abuses in garment factories linked to major brands • Area: Working Hours & Gender Discrimination • Story: In late 2018, a special report on garment factories in Ethiopia highlighted verbal abuses, labour abuses, poor working conditions, unpaid or forced overtime, docked wages for minor infractions, and wages well below the living wage for textile workers. PVH uses two facilities in Ethiopia to produce its goods where allegations of abuses have been reported: Arvind Lifestyle Apparel Manufacturing Plc. (Arvind) in the Bole Lemi Industrial Park in the outskirts of Addis Ababa and JP Textile Ethiopia Plc. (JP) in the Hawassa Industrial Park. At JP, reports alleged that garment workers were paid less than a living wage at 12 cents per hour and have an openly recognized policy to not hire pregnant women, reportedly probing women's abdomens during the interview process. The Hawassa Industrial Park was partially financed by PVH. Allegations of labour violations at Arvind include: punitive wage deductions, mandatory overtime, unpaid overtime, verbal abuse, and unsafe working conditions including fainting from overwork and unclean restrooms. • Sources: [Workers Rights Consortium - 31/12/2018: business-humanrights.org][Quartz Africa - 08/05/2019: qz.com][Reuters - 16/04/2019: reuters.com]
E(2).1	The Company has responded publicly to the allegation	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: Public response available: The company states that it takes the allegations raised in the Worker Rights Consortium report very seriously. It states that "some of the interviews are two years old and the Park and its practices have evolved since then." As of May 2019, the company had "commenced the investigation we committed to undertake using a credible third party who receives administrative support from someone on our Global Supply Chain team," and that it would take "appropriate action" for any violations found by the investigator. The company's response to the allegation includes other activities that the company is undertaking in Ethiopia with respect to human rights, positive working conditions, and initiatives led by other organizations in which PVH has been involved. [PVH response to Ethiopia allegations (BHRRC), 10/05/2019: business-humanrights.org] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Response goes into detail: The company has responded to the allegation but it has not provided a detailed response to every aspect of the allegation. [PVH response to Ethiopia allegations (BHRRC), 10/05/2019: business-humanrights.org]
E(2).2	The Company has appropriate policies in place	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: Company policies address the general issues raised: The company states that its business partners are "prohibited from requiring their employees to work more than the regular and overtime hours permitted under the law of the country where they are employed." The company provides maximum weekly work hours (48) and maximum overtime hours. The company also lays out practices for a day of rest in every seven-day period, and that business partners are not permitted to request overtime on a regular basis, or force overtime. The company also requires

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>that its business partners do not discriminate in employment with regard to hiring and gender, among other aspects. The company's supply chain guidelines state that business partners should "ensure that all legally mandated requirements for the protection or management of special categories of workers, including [...] pregnant or disabled workers, are implemented". [A Shared Commitment, 2019: responsibility.pvh.com & CR Supplier Guidelines, 01/2020: responsibility.pvh.com]</p> <ul style="list-style-type: none"> • Met: Policies apply to the type of business relationships involved: The company has 'A Shared Commitment' code, outlining the expectations for suppliers and other business partners, which states "This code is of utmost importance to PVH Corp. and embodies our commitment to the workers who manufacture our products and their communities. Adherence to the human and labor rights standards in this code by those who seek to do business with us, and by their business partners in our supply chain, is a prerequisite for establishing or continuing a relationship with our company." [A Shared Commitment, 2019: responsibility.pvh.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Policies address the specific rights in question: The company states that 'A Shared Commitment' code is based on the ILO Core Conventions. However, the company does not provide specific reference to conventions related to gender discrimination and working hours. [A Shared Commitment, 2019: responsibility.pvh.com]
E(2).3	The Company has taken appropriate action	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Engages with affected stakeholders: The company states that it would take "appropriate action" for any violations found during an independent investigation of the allegations in the Worker Rights Consortium report. However, the company has not published the results of this investigation. [PVH response to Ethiopia allegations (BHRRC), 10/05/2019: business-humanrights.org] • Not met: Encourages linked business to engage affected stakeholders: There is no evidence to suggest that the company has encouraged its suppliers to engage with affected stakeholders. • Not met: Provides remedies to affected stakeholders: There is no evidence to suggest that the company has provided remedies to affected stakeholders. • Not met: Has reviewed management systems to prevent recurrence: There is no evidence to suggest that the company has reviewed management systems to prevent recurrence. <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Remedies are satisfactory to the victims: There is no evidence to suggest that the company has provided remedies that are satisfactory to the victims. • Not met: Has improved systems and engaged affected stakeholders: There is no evidence to suggest that the company has improved systems and engaged affected stakeholders.
E(3).0	Serious allegation No 3		<ul style="list-style-type: none"> • Headline: Supply chains of Kraft Heinz and others criticized for forced labor and discrimination linked to China's political assimilation ethnic Uighurs and Muslims • Area: Forced labour • Story: 16 May 2019, An investigation by the Wall Street Journal (WSJ) has identified forced labour in supply chains linked to major western brands, including apparel and food manufacturers. The article cites interviews with a number of workers of Uyghur ethnicity, who have been 'recruited' from their villages and forced to work in factories as part of the Chinese government's 're-education' program focused in the Xinjiang region, which many NGO and human rights groups have criticised as amounting to situations of discrimination and coercion. In early 2017, the Communist Party began a new incarceration campaign, rounding up, detaining and forcibly indoctrinating Uyghurs and other Muslim minority ethnic groups in the far-western region. Islam has effectively been outlawed in the far-western region, with people routinely labelled as extremists and imprisoned for practising their religion. A UN committee describes the province as resembling a "mass internment camp", with estimates more than 1 million Uyghurs have been sent to prison or re-education camps. The article observes a number of factories in Xinjiang make yarn, which is then sent to other factories in China and countries including Bangladesh and Cambodia to produce clothing products. The article states that "Hong Kong-based Esquel Group—the world's largest contract shirt maker, which says its customers include Calvin Klein, Tommy Hilfiger, Nike Inc. and Patagonia Inc.—set up three spinning mills in Xinjiang to be close to the region's cotton fields". It quotes that Esquel CEO John Cheh said that in 2017 officials began offering the company Uighurs from southern Xinjiang as workers. Esquel took 34 in total the past two years, with all hiring decisions and training made

Indicator Code	Indicator name	Score (out of 2)	Explanation
			independently of the government, Mr. Cheh said. In response to enquiries from the WSJ, PVH Corp., the parent company of Calvin Klein and Tommy Hilfiger, said it plans to increase scrutiny of raw materials suppliers. • Sources: [Wall Street Journal - 16/05/2019: wsj.com]
E(3).1	The Company has responded publicly to the allegation	1	The individual elements of the assessment are met or not as follows: Score 1 • Met: Public response available: In response to the WSJ PVH said it planned to increase scrutiny of raw materials suppliers. In a subsequent communication to the Business & Human Rights Resource Centre the company said "We are deeply troubled by the reports of mistreatment and coercive labor practices involving Uighur and other minorities inside and outside Xinjiang Province. Our longstanding pledge to support workers' rights is captured in our "A Shared Commitment" code of conduct, which requires our business partners to comply with International Labor Organization Standards, including the elimination of all forms of forced labor. We monitor our business partners when possible to verify that they adhere to this requirement and require them in all instances to certify on their own that they do. While our suppliers have assured us that no violations exist within their business operations, we take seriously recent reports on the issue. This situation is extremely complex. Feasible, comprehensive, and sustainable solutions will require industry, civil society and government to participate willingly in open and honest dialogue. We continue to assess how to leverage our networks most effectively and work with our partners to uphold international labor standards given the current situation in the region and are utilizing expert guidance by analyzing the situation through the lens of the United Nations (UN) Guiding Principles on Business and Human Rights." [Response to the WSJ on BHRRC: media.business-humanrights.org] Score 2 • Not met: Response goes into detail: While the company provides a long response expressing concern about the situation in China, it doesn't provide sufficient detail in relation to the allegations it has been linked to, or the action that it has undertaken in response to the situation. [Response to the WSJ on BHRRC: media.business-humanrights.org]
E(3).2	The Company has appropriate policies in place	2	The individual elements of the assessment are met or not as follows: Score 1 • Met: Company policies address the general issues raised: The company's policy document 'A Shared Commitment' prohibits forced labour, saying "Our business partners are prohibited from utilizing forced labor, whether in the form of prison labor, indentured labor, bonded labor or otherwise. Mental and physical coercion, slavery and human trafficking are prohibited throughout our supply chain. [A Shared Commitment, 2019: responsibility.pvh.com] • Met: Policies apply to the type of business relationships involved: The company's policy document 'A Shared Commitment' says "At PVH, we require our business partners to comply with the letter and spirit of all laws, rules and regulations relevant to the conduct of their business and, in particular, those of the countries in which workers are employed in the manufacturing of our products. When local law and the code differ or conflict, we expect them to apply the highest standard. The following standards are prerequisites for all of our business partners and apply equally to their business partners in our supply chain... Forced Labour" [A Shared Commitment, 2019: responsibility.pvh.com & CR Supplier Guidelines, 01/2020: responsibility.pvh.com] Score 2 • Met: Policies address the specific rights in question: The Company indicates in its Supplier Guidelines that business partners/suppliers cannot deduct from workers' wages, costs or fees associated with employment eligibility such as health check, employment registration, work permits or recruitment agency fees... Additionally the Company states its suppliers cannot restrict free movement of workers. "DO NOT require workers to live in factory owned or controlled residences. (...) DO NOT impose unreasonable curfews in dormitories that restrict the movement of workers during their leisure time." [CR Supplier Guidelines, 01/2020: responsibility.pvh.com]
E(3).3	The Company has taken appropriate action	0	The individual elements of the assessment are met or not as follows: Score 1 • Not met: Denies allegations, but has engaged affected stakeholders: In the response PVH says " We monitor our business partners when possible to verify that they adhere to this requirement and require them in all instances to certify on their own that they do. While our suppliers have assured us that no violations exist within their business operations, we take seriously recent reports on the issue". In

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>the response to the WSJ by Esquel Group, CEO John Cheh said that in 2017 officials began offering the company Uighurs from southern Xinjiang as workers. He said Esquel took 34 in total the past two years, with all hiring decisions and training made independently of the government, and denied being forced to hire anyone. However its not clear that PVH or Esquel Group has engaged with the affected stakeholders. [Response to allegations of sourcing from Xinjiang, 17/03/2020: responsibility.pvh.com & Response to WSJ allegations, 16/05/2019: wsj.com]</p> <p>• Not met: Denies allegations, but reviewed systems to prevent such impacts: In its response PVH said it plans to increase scrutiny of its raw material suppliers. Additionally it said that "we continue to assess how to leverage our networks most effectively and work with our partners to uphold international labor standards given the current situation in the region and are utilizing expert guidance by analyzing the situation through the lens of the United Nations (UN) Guiding Principles on Business and Human Rights. But it is not clear what review has been undertaken in relation to the raw material sourcing. [Response to allegations of sourcing from Xinjiang, 17/03/2020: responsibility.pvh.com & Response to WSJ allegations, 16/05/2019: wsj.com]</p> <p>Score 2</p> <p>• Not met: Denies allegations, but implements review recommendations: In its response PVH said it plans to increase scrutiny of its raw material suppliers. Additionally it said that "we continue to assess how to leverage our networks most effectively and work with our partners to uphold international labor standards given the current situation in the region and are utilizing expert guidance by analyzing the situation through the lens of the United Nations (UN) Guiding Principles on Business and Human Rights. However it is not clear what changes the company has implemented as a result of these assessments [Response to WSJ allegations, 16/05/2019: wsj.com & Response to allegations of sourcing from Xinjiang, 17/03/2020: responsibility.pvh.com]</p> <p>• Not met: Denies allegations, and ensures systems prevent such impacts: In its response PVH said it plans to increase scrutiny of its raw material suppliers. Additionally it said that "we continue to assess how to leverage our networks most effectively and work with our partners to uphold international labor standards given the current situation in the region and are utilizing expert guidance by analyzing the situation through the lens of the United Nations (UN) Guiding Principles on Business and Human Rights. However it is not clear what changes the company has implemented to prevent such impacts occurring in the future. [Response to WSJ allegations, 16/05/2019: wsj.com & Response to allegations of sourcing from Xinjiang, 17/03/2020: responsibility.pvh.com]</p>

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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