

Company Name Panasonic Corporation
Industry ICT (Supply Chain and Own Operations)
UNGP Core Score (*) 6.5 out of 26

Score	Out of	For indicators
Governance and Policy Commitments		
2	2	A.1.1 Commitment to respect human rights
0.5	2	A.1.2 Commitment to respect the human rights of workers
1	2	A.1.4 Commitment to engage with stakeholders
0	2	A.1.5 Commitment to remedy
Embedding respect and Human Rights Due Diligence		
Embedding respect		
1.5	2	B.1.1 Embedding - Responsibility and resources for day-to-day human rights functions
Human Rights Due Diligence (HRDD)		
0	2	B.2.1 HRDD - Identifying: Processes and triggers for identifying human rights risks and impacts
0	2	B.2.2 HRDD - Assessing: Assessment of risks and impacts identified (salient risks and key industry risks)
0	2	B.2.3 HRDD - Integrating and Acting: Integrating assessment findings internally and taking appropriate action
0	2	B.2.4 HRDD - Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts
0	2	B.2.5 HRDD - Reporting: Accounting for how human rights impacts are addressed
Remedies and Grievance Mechanisms		
1.5	2	C.1 Grievance channels/mechanisms to receive complaints or concerns from workers
0	2	C.2 Grievance channels/mechanisms to receive complaints or concerns from external individuals and communities
0	2	C.7 Remedying adverse impacts and incorporating lessons learned
6.5	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: General HRs commitment: In its Code of Conduct, the Company states: 'As a global company, we must respect human rights and do our best to understand, acknowledge and respect the diverse culture, religions, mindsets, laws and regulations of people in different countries and regions where we conduct business'. [Code of Conduct, 16/05/2019: panasonic.com] <p>Score 2</p> <ul style="list-style-type: none"> Met: OECD: The Company indicates: 'Panasonic supports the fundamental principles of the United Nations Universal Declaration of Human Rights, the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work, and the OECD Guidelines for Multinational Enterprises'. [2020 Sustainability Data Book, 31/03/2020: panasonic.com]
A.1.2	Commitment to respect the human rights of workers	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: ILO Core: The Company states: 'Panasonic supports the fundamental principles of the United Nations Universal Declaration of Human Rights, the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work'. [2020 Sustainability Data Book, 31/03/2020: panasonic.com] Not met: Explicitly list ALL four ILO for ICT suppliers: The Company states, in its 2020 Sustainability Data Book: 'We ask our suppliers to meet our CSR requirements, including the respect of human rights and the health and safety of workers'. In its Supply Chain Promotion Guidelines, it requests, among others: prohibition of forced labor, prohibition of child labor, elimination of discrimination, freedom of participation. Regarding freedom of participation, it explains: 'suppliers shall allow workers the freedom of association as the method of labor management consultation on working conditions, working environment, wage levels, and other relevant matters'. More specifically, 'suppliers shall allow workers to hold collective bargaining and participate in a peaceful assembly. Suppliers shall allow the rights of workers to organize and join a labor union in accordance with local laws'. However, it is not clear whether it is committed to respect these rights in all contexts and locations (i.e. alternative mechanisms for those countries where there are legal restrictions to the exercise of these rights), as the Company indicates that it respects these rights 'in accordance with local laws'. [2020 Sustainability Data Book, 31/03/2020: panasonic.com & Panasonic Supply Chain CSR Promotion Guidelines, 23/07/2018: panasonic.com] <p>Score 2</p> <ul style="list-style-type: none"> Met: Explicit commitment to All four ILO Core: In its 2020 Sustainability Data Book, it commits to respect: prohibition of forced labor, prohibition of child labor, prohibition of discrimination, freedom of association and guarantee of right to organize, guarantee of right of collective bargaining. Regarding The Respect for the Freedom of Association and the Right to Collective Bargaining, the company indicates: 'Panasonic believes that the freedom of association, combined with the right to collective bargaining, is one of the fundamental human rights that companies should respect. In countries and regions that allow for the formation of labor unions—as for instance, in Japan—Panasonic and the Panasonic Group Workers Union Association have stipulated in their labor agreement that unions retain the rights to organize, to collectively bargain and to strike. In addition, even in countries and regions where the formation of labor unions is not permitted by laws, regulations, or conventional labor practices, the Panasonic Code of Conduct stipulates the de facto promotion of issue resolution through labor-management dialogues, which are the goals of the principles of the freedom of association and the right to collective bargaining'. [2020 Sustainability Data Book, 31/03/2020: panasonic.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Met: Respect H&S of workers: The Company states: 'Panasonic Corporation is committed to creating safe and both physically and mentally healthy workplaces through consistent effort and appropriate and careful attention.' Then, the Company lists it in 'Activity Guidelines for Occupational Safety and Health' explicitly. [2020 Sustainability Data Book, 31/03/2020: panasonic.com] • Met: H&S applies to ICT suppliers: The Company, in its 202 Sustainability Data Book, indicates: 'We ask our suppliers to meet our CSR requirements, including the respect of human rights and the health and safety of workers'. Moreover, the Company states: 'Suppliers shall work to improve occupational health and safety. Suppliers recognize that in addition to minimizing the work-related injury and illness, safe and healthy working environment enhance the quality of products and services, consistency of production, and worker retention and morale. Suppliers shall formulate health and safety policies and disclose them on the website or in any other means. In addition, suppliers shall conduct risk assessment and take corrective measures by establishing management systems.' [Panasonic Supply Chain CSR Promotion Guidelines, 23/07/2018: panasonic.com & 2020 Sustainability Data Book, 31/03/2020: panasonic.com] • Not met: working hours for workers: The Company indicates: 'Based on labor-related laws and labor-management agreements (labor agreements, etc.) in the respective countries, Panasonic has established provisions in its work regulations related to elements including appropriate working hours, break times, overtime work, holidays and leave. In addition, Panasonic strives for the optimal placement of personnel, so that excessive overtime is not exclusively imposed on certain employees. (...) We have also established our own working-hours management system to ensure compliance with Japanese labor laws, and since fiscal 2018, we have been engaged in programs for all employees, including management, that are meant to eliminate excessive overtime above 80 hours per month and to have all employees leave work every day by 8 p.m.'. However, no evidence found of references to standard weekly hours or the Company explicitly committing to respect ILO conventions on working hours. [2020 Sustainability Data Book, 31/03/2020: panasonic.com] • Not met: Working hours for ICT suppliers: The Company indicates: 'Suppliers shall ensure the workers' working hours, day off, and annual leaves appropriately managed, so that it does not infringe statutory limits. A workweek shall not exceed 60 hours per week, including overtime work, except in emergency or unusual situations. Any local law or regulation shall apply if it is stricter than this provision; Scheduled and actual annual working hours shall not exceed the statutory limit; Workers shall be allowed to take at least one day off per seven working days.' Then, the Company explains with details each one, and none of them relates to human rights.' However, no details found regarding requirements for suppliers to commit to a maximum of 48 hours for standard weekly hours or to respect international standards on working hours [Panasonic Supply Chain CSR Promotion Guidelines, 23/07/2018: panasonic.com]
A.1.4	Commitment to engage with stakeholders	1	<p>The individual elements of the assessment are met or not as follows: Score 1</p> <ul style="list-style-type: none"> • Not met: Commits to stakeholder engagement [Sustainability Data book 2019, 14/11/2019: panasonic.com] • Met: Regular stakeholder engagement: The Company indicates: 'Panasonic conducts dialogues with its wide range of stakeholders around the world—including customers, investors, suppliers, governments, industry bodies, NPOs, NGOs, local communities, and employees—on various aspects of its business. The Company incorporates the opinions it receives into its business activities and product creation'. Regarding the Company's dialogue to unions, in the context of Japan, 'At Panasonic, important management issues are discussed in advance with the labor unions, and Management-Labor Committees are established as a forum for people to express their opinions on these issues. Particularly, important decisions are explained to the labor unions, and Labor-Management Councils are held to provide an opportunity for people to express their approval or to propose changes'. Both Management-Labor Committees and Labor-Management Councils are held periodically. The Company indicates, that in Japan, 96,7% of all employees are labor union members. In Japan, 'labor unions conduct annual surveys of wage conditions among their members'. In Europe, 'Panasonic set up a voluntary agreement to provide a venue for meaningful discussions between labor and management, and established the Panasonic European Employee Congress (PEEC). As for China, 'Panasonic conducts initiatives including periodic labor-management dialogues, (...) and prior explanations to unions concerning important management decisions. (...) In 2019, we deliberated on issues including remuneration, employee benefits (...)'. [2020 Sustainability Data Book, 31/03/2020: panasonic.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> • Not met: Commits to engage stakeholders in design [Sustainability Data book 2019, 14/11/2019: panasonic.com] • Not met: Regular stakeholder design engagement: The Company states: 'In fiscal 2016, Panasonic complemented the Code of Conduct by setting a "Global Rights and Labor Policies" and by implementing a management system for abiding by that policy. The management system comprises several elements, including self-assessment checklists for properly identifying risks and evaluating potential impacts on human rights, as well as a manual outlining the procedures for correcting the risks that have been identified and for carrying out continuous improvement. Going forward, in addition to efforts conducted with its employees, Panasonic will continue to cooperate with its suppliers throughout the world to fully understand laws and labor practices in different countries and to respect human rights'. However, no clear evidence of regular engagement of affected stakeholders in the monitoring of its human rights approach could be found. [2020 Sustainability Data Book, 31/03/2020: panasonic.com]
A.1.5	Commitment to remedy	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Commits to remedy: The Company states: 'If we suspect that our activities violate applicable laws, regulations or business ethics, we will report such information to a superior, or to the legal affairs section or other relevant section, or via an in-house notification hotline. Whistleblowers shall be protected from dismissal, demotion, or any other retaliatory treatment because of their well-intentioned reporting of possible violations of any law or regulation. We will ensure thorough and confidential treatment of information reported. Once we have established that a law or regulation has been violated, we will immediately seek to remedy the violation, take appropriate action and prevent it from recurring.' However, there is no enough evidence the Company is committed to remedy adverse impacts on individuals and workers and communities that it has caused or contributed to. [Code of Conduct, 16/05/2019: panasonic.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Not obstructing access to other remedies • Not met: Collaborating with other remedy initiatives • Not met: Work with ICT suppliers to remedy impacts

Embedding Respect and Human Rights Due Diligence

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.1	Responsibility and resources for day-to-day human rights functions	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Commits to ILO core conventions: See indicator A.1.2. The Company is committed to the ILO Declaration. • Met: Senior responsibility for HR: In its Sustainability Data Book the Company indicates that 'The Chief Human Resources Officer (CHRO) is Executive Officer Shigeki Mishima (...). The Department responsible for the respect of human rights consist of the Human Resources & Industrial Relations Department established at the Panasonic headquarters, the human resources departments located in each of the seven Panasonic Companies (...), and all business divisions and affiliated companies under the Panasonic umbrella'. [2020 Sustainability Data Book, 31/03/2020: panasonic.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Day-to-day responsibility: As indicated above, the department responsible is the 'Human Resources & Industrial Relations Department' established at the headquarters and in each of the seven Panasonic Companies (...), and all business divisions and affiliated companies'. In addition, has established an Equal Partnership Consultation Office and it has also created contact offices in each Divisional Company and business division: 'This reporting framework allows us to address any human rights violation concern by employees, including temporary staff'. [2020 Sustainability Data Book, 31/03/2020: panasonic.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> Not met: Day-to-day responsibility for ICT in supply chain: The Company indicates: 'The department responsible for responsible procurement activities is Panasonic's Global Procurement Company. Each of our Divisional Companies, as well as their business divisions and other affiliated companies have their own procurement departments. The Global Procurement Company collaborates with these Divisional Companies' procurement departments to strengthen CSR procurement activities at the Corporate-wide level. Each Divisional Company and business division follows the PDCA cycle by planning and promoting initiatives in line with Corporate-wide rules and manuals related to procurement operations. Issues that arise in this process are addressed and appropriate solutions devised through discussions during meetings attended by the personnel in charge of procurement functions in each Divisional Company and business division'. [2020 Sustainability Data Book, 31/03/2020: panasonic.com]
B.2.1	Identifying: Processes and triggers for identifying 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: Identifying risks in own operations Not met: Identifying risks in ICT suppliers: The Company states that 'as part of our initiative to identify and mitigate risk, we have taken a number of actions to verify the absence of modern slavery in our supply chain'. It includes: compliance with the Code of Conduct; a recruitment process that takes into consideration the protection of fundamental human rights; training; confidential whistle-blowing; procurement policy; supplier compliance with CSR requirements. However, it is not clear the process to identify its human rights risks and impacts in its supply chain. [2020 Sustainability Data Book, 31/03/2020: panasonic.com] <p>Score 2</p> <ul style="list-style-type: none"> Not met: Ongoing global risk identification: The Company has a system in place to identify major risks and appropriate countermeasures but it does not mention human rights as a part of it. No further evidence found. [2020 Sustainability Data Book, 31/03/2020: panasonic.com] Not met: In consultation with stakeholders Not met: In consultation with HR experts Not met: Triggered by new circumstances
B.2.2	Assessing: Assessment of risks and impacts identified (salient risks and key industry risks)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Not met: Salient risk assessment (and context): The Company indicates: 'Modern slavery risks are believed to be especially high in certain regions of the world. We are aware there are greater human rights and labor-related risks in areas where migrant foreign workers are widely employed. Panasonic is actively implementing a program of enhanced checks in these regions to ensure compliance with local legislation'. However, it is not clear its process(es) for assessing its human rights risks and what the Company considers to be its salient human rights issues. [2020 Sustainability Data Book, 31/03/2020: panasonic.com] Not met: Public disclosure of salient risks <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	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Not met: Action Plans to mitigate risks: Even though the Company has implemented an occupational health and safety management system, that involves periodic reviews and promotes engagement with employees in health and safety-related activities, no evidence found of a global system to take action to prevent, mitigate or remediate salient human rights issues. No further evidence found. [2020 Sustainability Data Book, 31/03/2020: panasonic.com] Not met: Including in ICT supply chain Not met: Example of Actions decided <p>Score 2</p> <ul style="list-style-type: none"> Not met: Both requirements under score 1 met
B.2.4	Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Not met: System to check if Actions are effective 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

Indicator Code	Indicator name	Score (out of 2)	Explanation
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 • Not met: Including ICT suppliers: In order to be awarded this indicator, the Company has to achieve a full score in B.2.2/B.2.3/B.2.4 and at least 1,5 points in B.2.1 <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Responding to affected stakeholders concerns • Not met: Ensuring affected stakeholders can access communications

Remedies and Grievance Mechanisms

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.1	Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Channel accessible to all workers: The Company states: 'We have established global hotlines as a mechanism for employees to report potential risks regarding matters such as compliance violations, various forms of workplace harassment and improprieties in procurement processes. Employees and suppliers are able to report any perceived problem independently and at any time, with assurance that their privacy will be protected. The Company has also established a mechanism by which all employees can voluntarily report latent compliance-related risks in the workplace through annually conducted compliance awareness surveys. Feedback concerning reported risks is channelled back to each workplace for them to handle'. The hotline is available online. [2020 Sustainability Data Book, 31/03/2020: panasonic.com & EthicsPoint, N/A: secure.ethicspoint.eu] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Number grievances filed, addressed or resolved: The Company indicates 'In fiscal 2020, we received approximately 760 reports and requests for consultation, mostly through the abovementioned hotline. For all the contacts received through our global hotline, support desks coordinated with relevant divisions to investigate, check, and respond to claims'. Although the Company discloses the number of reports for the FY 2020, it is not clear the number of human rights grievances filed, and either addressed or resolved. [2020 Sustainability Data Book, 31/03/2020: panasonic.com] • Met: Channel is available in all appropriate languages: The hotline service is available in 28 languages. It seems to cover all appropriate languages of countries where the Company operates. [2020 Sustainability Data Book, 31/03/2020: panasonic.com & EthicsPoint, N/A: secure.ethicspoint.eu] • Met: Opens own system to ICT supplier workers: The Company indicates: 'we have established a global hotline (with service in 28 languages) for our employees and external business partners. Reports can be made to this hotline whenever compliance violations (including human rights-related violations) are noticed or suspected'. Also, 'We have established global hotlines as a mechanism for employees to report potential risks regarding matters such as compliance violations, various forms of workplace harassment and improprieties in procurement processes. Employees and suppliers are able to report any perceived problem independently and at any time'. [2020 Sustainability Data Book, 31/03/2020: panasonic.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: The Company states: 'We have established a global hotline (with service in 28 languages) for our employees and external business partners'. Moreover, 'Employees and suppliers are able to report any perceived problem independently and at any time'. However, no evidence found that the mechanism is also accessible to all external individuals and communities who may be adversely impacted by the Company. [2020 Sustainability Data Book, 31/03/2020: panasonic.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Describes accessibility and local languages • Not met: Expects ICT supplier to have community grievance systems • Not met: ICT supplier communities use global system

Indicator Code	Indicator name	Score (out of 2)	Explanation
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: Even though the Company gives an example of an issue related to occupational health and safety of the workers in their supply chain in China and in Thailand, and the Company indicates it requested corrections, no evidence found of the approach it took to provide or enable a timely remedy for victims for adverse human rights impacts which it has caused or to which it has contributed. [2020 Sustainability Data Book, 31/03/2020: panasonic.com] Not met: Says how it would remedy key sector risks <p>Score 2</p> <ul style="list-style-type: none"> Not met: Changes introduced to stop repetition Not met: Approach to learning from incident to prevent future impacts Not met: Evaluation of the channel/mechanism

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
E(1).0	Serious allegation No 1		<ul style="list-style-type: none"> Headline: Panasonic suspended from foreign trainee programme due to illegal overtime work Area: Working Hours Story: On January 25, 2019, the Japanese Justice Ministry and Labour Ministry suspended four firms, including Panasonic, from a foreign technical trainee programme after allegations of illegal overtime work. <p>According to the press, Panasonic's trainee programme was cancelled for 82 Chinese and Malaysian trainees who were at a plant in Tonami, Toyama Prefecture, who were alleged of doing illegal overtime work. The measure was taken after the company was handed down a JPY 300,000 (USD 2,700) fine for having a male employee work for illegally long overtime hours at the Tonami factory, who subsequently died. Thus, Panasonic was punished because it was found to have violated the Labour Standards Law involving a Japanese employee.</p> <p>The Japanese authorities ruled that during the next five years Panasonic will not be able to hire foreign technical trainees.</p> <ul style="list-style-type: none"> Sources: [Nikkei Asian Review - 25/01/2019: asia.nikkei.com][The Mainichi - 25/01/2019: mainichi.jp]
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: According to the press, the Company stated "'We are taking the situation seriously and are working to help our interns continue their training without concern' by facilitating their transfer to other companies'." [Mitsubishi and Panasonic banned from hiring foreign interns, 25/01/2019: asia.nikkei.com & 2 big-name firms banned from hiring foreign tech trainees, 26/01/2019] <p>Score 2</p> <ul style="list-style-type: none"> Not met: Response goes into detail
E(1).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 it has a policy relating to working hours. [Sustainability Data book 2019, 14/11/2019: panasonic.com] Met: Policies apply to the type of business relationships involved: The Company also requires suppliers to follow working hour guidelines. [Panasonic Supply Chain CSR Promotion Guidelines, 23/07/2018: panasonic.com] <p>Score 2</p> <ul style="list-style-type: none"> Not met: Policies address the specific rights in question: The policies do not seem to cover international standards.
E(1).3	The Company has taken appropriate action	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Not met: Engages with affected stakeholders: According to the press, the Company stated "'We are taking the situation seriously and are working to help our interns continue their training without concern' by facilitating their transfer to other companies'." However, it is unclear if the Company has engaged with the employees who were found to be working overtime hours outside the legal limits. [Mitsubishi and Panasonic banned from hiring foreign interns, 25/01/2019: asia.nikkei.com & 2 big-name firms banned from hiring foreign tech trainees, 26/01/2019]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not met: Provides remedies to affected stakeholders • Not met: Has reviewed management systems to prevent recurrence Score 2 <ul style="list-style-type: none"> • Not met: Remedies are satisfactory to the victims • Not met: Has improved systems and engaged affected stakeholders
E(2).0	Serious allegation No 2		<ul style="list-style-type: none"> • Headline: Panasonic & other companies' suppliers accused of forced labour on migrant workers in Malaysia • Area: forced labour • Story: On June 28, 2019, Danwatch, a Danish investigative media and research centre, published an investigation report detailing alleged fundamental human and labour rights violations against Nepalese and Indonesian migrant employees working at Malaysian factories producing components for major electronics companies, including Panasonic. The allegations are based on interviews with migrant workers, some were employed at Mctronic which supplies Panasonic with telephone parts. According to the report, employees reported several allegations including: <ul style="list-style-type: none"> - passport confiscation - requirement to pay significant amount of money to get passports back - non-remuneration of overtime work - excessive recruitment fees - reductions of wages <ul style="list-style-type: none"> • Sources: [Danwatch - 28/06/2019: danwatch.dk][Danwatch - 28/06/2019: danwatch.dk][Business & Human Rights Resource Centre - 28/06/2019: business-humanrights.org][]
E(2).1	The Company has responded publicly to the allegation	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Public response available: The Company provided the following response to Danwatch: 'At Panasonic, media spokesperson Mio Yamanaka tells Danwatch that they have been in contact with Mctronic. She also states that the factory told a different story but refrains from promising that Panasonic will investigate the matter further. "Mctronic explained that their 39 workers recently quit their job and returned to their home country. When Mctronic proposed to their employees that they change their workplace due to operational change at the factory, their workers refused to accept this proposal and decided to resign. The wages of the workers were fully paid by Mctronic", Yamanaka writes.' [I feel scared going out: How migrant workers become outlaws in Malaysia's electronics industry, 28/06/2019: danwatch.dk] Score 2 <ul style="list-style-type: none"> • Not met: Response goes into detail
E(2).2	The Company has appropriate policies in place	2	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Company policies address the general issues raised: One of the fundamental rights that the Company respects is the prohibition of forced labour. [Sustainability Data book 2019, 14/11/2019: panasonic.com] • Met: Policies apply to the type of business relationships involved: The Company also prohibits forced labour for suppliers. [Panasonic Supply Chain CSR Promotion Guidelines, 23/07/2018: panasonic.com] Score 2 <ul style="list-style-type: none"> • Met: Policies address the specific rights in question: Suppliers cannot retain identification documents or work documents, nor can they engage in debt bondage. [Panasonic Supply Chain CSR Promotion Guidelines, 23/07/2018: panasonic.com]
E(2).3	The Company has taken appropriate action	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Engages with affected stakeholders: According to Danwatch, the website that broke the story, a spokesperson for the Company said 'Panasonic believes that we should consider doing a more in-depth survey that does not rely solely on the supplier's information.' However, no evidence of engagement with affected stakeholders could be found. [I feel scared going out: How migrant workers become outlaws in Malaysia's electronics industry, 28/06/2019: danwatch.dk] Score 2 <ul style="list-style-type: none"> • Not met: Encourages linked business to engage affected stakeholders • Not met: Provides remedies to affected stakeholders • Not met: Has reviewed management systems to prevent recurrence Score 2 <ul style="list-style-type: none"> • Not met: Remedies are satisfactory to the victims • Not met: Has improved systems and engaged affected stakeholders

Indicator Code	Indicator name	Score (out of 2)	Explanation
E(3).0	Serious allegation No 3		<ul style="list-style-type: none"> • Headline: Mica mineral suppliers of CRRC MA, Panasonic, and others accused of using child laborers in Madagascar • Area: child labour; forced labour • Story: On Monday, November 18, 2019, Dutch NGO Terre des Hommes released a report documenting the widespread use of child labor at mica mining sites in Madagascar. According to the human rights advocates at Terre des Hommes, at least 11,000 children between the ages of five and 17 are employed in quarrying and processing mica. Mining mica is dangerous work, with children complaining of aching muscles, headaches, dehydration, open sores, and respiratory problems, according to The Guardian. Mica is used in a range of common products, including cosmetics and paints, with 87 percent of the mineral mined in Madagascar shipped to China. One of Panasonic's suppliers Mica Glory, purchases Mica 'from at least two other companies that are identified as sourcing mica in Madagascar, namely Shengying and VP' • Sources: [NBC News - 18/11/2019: nbcnews.com][The Guardian - 21/11/19: theguardian.com][Africa Times - 20/11/19: africatimes.com][Terre des hommes - 14/11/19: assets.documentcloud.org]
E(3).1	The Company has responded publicly to the allegation	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Public response available: The Company responded to the report, however this response does not include acknowledgement of the allegation. [Company responses to mica report, N/A: documentcloud.org] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Response goes into detail
E(3).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 respects the prohibition of child labour and the prohibition of forced labour. [Sustainability Data book 2019, 14/11/2019: panasonic.com] • Met: Policies apply to the type of business relationships involved: Suppliers have requirements against the use of child and forced labour. [Panasonic Supply Chain CSR Promotion Guidelines, 23/07/2018: panasonic.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Policies address the specific rights in question: The Company has mechanisms that prevent forced labour in the supply chain, but not child labour. [Panasonic Supply Chain CSR Promotion Guidelines, 23/07/2018: panasonic.com]
E(3).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 • Not met: Provides remedies to affected stakeholders • Not met: 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 • Not met: Has improved systems and engaged affected stakeholders
E(4).0	Serious allegation No 4		<ul style="list-style-type: none"> • Headline: Cal-Comp Electronics accused of sourcing from recruitment agencies linked to systematic exploitation of migrant laborers in Thailand • Area: forced labour • Story: October 2018, Electronics Watch released a report which found that many migrant workers at Cal-Comp Electronic's manufacturing operations in Thailand remain at a heightened risk of exposure to conditions of forced labour. The report notes that despite changes undertaken by the company in 2016, migrant workers from Myanmar continue to report excessive recruitment fees, in excess of the 79 Euro limit they should have to pay under Myanmar regulations, which are being required by recruitment agencies in Thailand. The report notes that "In some cases workers have reported nearly €700 in recruitment related service fees or costs, equivalent to more than two months salary". A second report, released in February 2020, explains how the situation has improved throughout three years of monitoring and action taken by Electronics Watch and the Migrant Workers Rights Network. It states that while Cal-Comp was not able to control its recruiting agencies, since 2017 all workers controlled their own passports and work permits, they have received their contracts in their native languages, and had received partial reimbursement for their fees. By 2019, the company agreed to pay back all workers' fees who started at the company during or after January 2016. • Sources: [Electronics Watch - 10/2018: electronicswatch.org][BHRRC - 10/2018: business-humanrights.org][Electronics Watch - 02/2020: electronicswatch.org]
E(4).1	The Company has responded	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Public response available

Indicator Code	Indicator name	Score (out of 2)	Explanation
	publicly to the allegation		Score 2 • Not met: Response goes into detail
E(4).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 prohibits forced labour. [Sustainability Data book 2019, 14/11/2019: panasonic.com] • Met: Policies apply to the type of business relationships involved: The Company prohibits forced labour for suppliers. [Panasonic Supply Chain CSR Promotion Guidelines, 23/07/2018: panasonic.com] Score 2 • Met: Policies address the specific rights in question: Suppliers are expected to have mechanisms in place to prevent the use of forced labour. [Panasonic Supply Chain CSR Promotion Guidelines, 23/07/2018: panasonic.com]
E(4).3	The Company has taken appropriate action	0	The individual elements of the assessment are met or not as follows: Score 1 • Not met: Engages with affected stakeholders • Not met: Encourages linked business to engage affected stakeholders • Not met: Provides remedies to affected stakeholders: Remedy has been provided by Cal-Comp to 10,570 workers as noted in the 2020 Electronics Watch report [Electronics Watch update: electronicswatch.org] • Not met: Has reviewed management systems to prevent recurrence Score 2 • Not met: Remedies are satisfactory to the victims • Not met: Has improved systems and engaged affected stakeholders

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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