

**Company Name** Prada  
**Industry** Apparel (Supply Chain and Own Operations)  
**UNGP Core Score (\*)** 4.5 out of 26

Score	Out of	For indicators
<b>Governance and Policy Commitments</b>		
2	2	A.1.1 Commitment to respect human rights
1.5	2	A.1.2 Commitment to respect the human rights of workers
0	2	A.1.4 Commitment to engage with stakeholders
0	2	A.1.5 Commitment to remedy
<b>Embedding respect and Human Rights Due Diligence</b>		
Embedding respect		
0	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
<b>Remedies and Grievance Mechanisms</b>		
1	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
<b>4.5</b>	<b>26</b>	

(\*) 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"> <li>• Met: General HRs commitment: In its Sustainability Policy the Company states 'the Prada Group is committed to operating with full respect for the value of the individual and for the human and workers' rights enshrined in Italian and international covenants and declarations, such as the United Nations Universal Declaration of Human Rights, the International Labor Organization (ILO) Declaration on Fundamental Principles and Rights at Work, and the Organization for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises'. [Sustainability Policy, 15.03.2019: <a href="http://pradagroup.com">pradagroup.com</a>]</li> <li>• Met: UDHR: See above [Sustainability Policy, 15.03.2019: <a href="http://pradagroup.com">pradagroup.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: OECD: As indicated above the Company is committed to operate in full respect with a number of initiatives including the OECD Guidelines for MNEs. [Sustainability Policy, 15.03.2019: <a href="http://pradagroup.com">pradagroup.com</a>]</li> </ul>
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"> <li>• Met: ILO Core: In its Sustainability Policy the Company states 'Moreover, the Prada Group is committed to operating with full respect for the value of the individual and for the human and workers' rights enshrined in Italian and international covenants and declarations, such as [...] the International Labor Organization (ILO) Declaration on Fundamental Principles and Rights at Work'. [Sustainability Policy, 15.03.2019: <a href="http://pradagroup.com">pradagroup.com</a> &amp; Code of Ethics: <a href="http://pradagroup.com">pradagroup.com</a>]</li> <li>• Met: Explicitly list ALL four ILO for AP suppliers: The Company states in its Sustainability Policy that 'the Prada Group is committed to operating with full respect for the value of the individual and for the human and workers' rights enshrined in Italian and international covenants and declarations, such as [...] the International Labor Organization (ILO) Declaration on Fundamental Principles and Rights at Work' and that it 'considers unacceptable any form of forced labor or child labor and any type of employment or professional discrimination' and that it 'recognizes the right to collective bargaining and to exercise freedom of association both internally and within its sphere of influence throughout the entire value chain.' [Code of Ethics: <a href="http://pradagroup.com">pradagroup.com</a> &amp; Sustainability Policy, 15.03.2019: <a href="http://pradagroup.com">pradagroup.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Explicit commitment to All four ILO Core: In its Sustainability Policy the Company states that it 'considers unacceptable any form of forced labor or child labor and any type of employment or professional discrimination. It recognizes the right to collective bargaining and to exercise freedom of association both internally and within its sphere of influence throughout the entire value chain.' [Sustainability Policy, 15.03.2019: <a href="http://pradagroup.com">pradagroup.com</a> &amp; Code of Ethics: <a href="http://pradagroup.com">pradagroup.com</a>]</li> <li>• Met: Respect H&amp;S of workers: The code of ethics indicates that "Prada spa and the companies of the Group exert themselves to embed a culture of health and safety for workers in the workplace, fostering risk awareness and stimulating individual responsibility". And in the Annual Report 2017 the Company states that "internal policies safeguard the health and safety of employees at all Company locations according to the highest standards and in full compliance with local and international regulations." [Annual Report 2017, 2017: <a href="http://pradagroup.com">pradagroup.com</a> &amp; Code of Ethics: <a href="http://pradagroup.com">pradagroup.com</a>]</li> <li>• Met: H&amp;S applies to AP suppliers: The Code of Ethics states that 'Prada spa and the companies of the Group exert themselves to embed a culture of health and safety for workers in the workplace, fostering risk awareness and stimulating individual responsibility'. Its Annual Report 2018 indicates that 'the signing of the</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			Code of Ethics is a fundamental prerequisite for working with Prada.' [Code of Ethics: <a href="http://pradagroup.com">pradagroup.com</a> & Annual Report 2018, 2019: <a href="http://pradagroup.com">pradagroup.com</a> ] <ul style="list-style-type: none"> <li>• Met: working hours for workers: The Company states that it complies with the applicable international and national laws and regulations for working hours, minimum guaranteed breaks and rest periods. [Social responsibility report 2018, 15.03.2019: <a href="http://pradagroup.com">pradagroup.com</a>]</li> <li>• Not met: Working hours for AP suppliers</li> </ul>
A.1.4	Commitment to engage with stakeholders	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Commits to stakeholder engagement: Although the Company states in its Sustainability Policy that 'The Group's cooperation with stakeholders such as trade Unions and tax authorities, and with partners outside its specific scope of business such as universities and large International institutions, is considered key to the establishment of common values based on a balance between business objectives and societal demands.' there is no clear evidence how this relates to affected stakeholders, such as workers' families, local communities and any other person or group of people whose life and environment might be impacted. No further evidence found in the Code of Ethics 2019 either. [Sustainability Policy, 15.03.2019: <a href="http://pradagroup.com">pradagroup.com</a> &amp; Code of Ethics 2019, 2019: <a href="http://pradagroup.com">pradagroup.com</a>]</li> <li>• Not met: Regular stakeholder engagement: The Company states: 'The Group promotes freedom of association and recognizes the right to collective bargaining. In fact, the Prada Group engages with trade unions to improve the working conditions of its employees and to foster the medium/long-term well-being of its employees and thus its surrounding communities. Over the years the Group has stipulated many supplementary agreements especially in Italy, the United Kingdom and France, whereby it offers better benefits than those established in the local collective bargaining agreements'. It also indicates that the 'National Collective Labor Contracts' is stipulated at national level for commodity sectors between trade unions and associations representing companies. It is negotiated and renewed every three years. However, no further details found in relation to actual engagement that has taken place between the Company and affected stakeholders in last two years (regular engagement). [Social Responsibility Report 2019, N/A: <a href="http://pradagroup.com">pradagroup.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Commits to engage stakeholders in design: No evidence found</li> <li>• Not met: Regular stakeholder design engagement: No evidence found.</li> </ul>
A.1.5	Commitment to remedy	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Commits to remedy</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Not obstructing access to other remedies</li> <li>• Not met: Collaborating with other remedy initiatives</li> <li>• Not met: Work with AP suppliers to remedy impacts</li> </ul>

## 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	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Met: Commits to ILO core conventions: See A.1.2. The Company is committed to ILO Conventions. [Sustainability Policy, 15.03.2019: <a href="http://pradagroup.com">pradagroup.com</a>]</li> <li>• Not met: Senior responsibility for HR</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Day-to-day responsibility</li> <li>• Not met: Day-to-day responsibility for AP in supply chain</li> </ul>
B.2.1	Identifying: Processes and triggers for identifying human rights risks and impacts	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Identifying risks in own operations: The Company states: 'Risk assessment consists of identifying and analyzing factors that could compromise the proper conduct of company activities and must also extend to the analysis of the process that determines how those risks should be avoided or mitigated. The fact that economic, regulatory and operating environments are in constant flux raises the need for mechanisms that help identify and deal with the risks posed by such changes.' It also indicates that human rights are related to sustainability risks, but there is no description of the identification process in its own operations. [Social Responsibility Report 2019, N/A: <a href="http://pradagroup.com">pradagroup.com</a>]</li> <li>• Not met: Identifying risks in AP suppliers</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			Score 2 <ul style="list-style-type: none"> <li>• Not met: Ongoing global risk identification</li> <li>• Not met: In consultation with stakeholders</li> <li>• Not met: In consultation with HR experts</li> <li>• Not met: Triggered by new circumstances</li> </ul>
B.2.2	Assessing: Assessment of risks and impacts identified (salient risks and key industry risks)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Salient risk assessment (and context)</li> <li>• Not met: Public disclosure of salient risks</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> </ul>
B.2.3	Integrating and Acting: Integrating assessment findings internally and taking appropriate action	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Action Plans to mitigate risks</li> <li>• Not met: Including in AP supply chain</li> <li>• Not met: Example of Actions decided</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> </ul>
B.2.4	Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: System to check if Actions are effective</li> <li>• Not met: Lessons learnt from checking effectiveness</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Both requirement under score 1 met</li> </ul>
B.2.5	Communicating : Accounting for how human rights impacts are addressed	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Comms plan re identifying risks: In order to be awarded this indicator, the Company needs to achieve at least 1,5 points in B.2.1</li> <li>• Not met: Comms plan re assessing risks</li> <li>• Not met: Comms plan re action plans for risks</li> <li>• Not met: Comms plan re reviewing action plans</li> <li>• Not met: Including AP suppliers</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Responding to affected stakeholders concerns</li> <li>• Not met: Ensuring affected stakeholders can access communications</li> </ul>

## 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	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Met: Channel accessible to all workers: The Company states in its 2019 Social Responsibility Report that 'All the employees can communicate anonymously to the Supervisory Body through an e-mail address available on the Company's Intranet. In 2019 there were no communications of behavior that could constitute a violation of the Organizational Model, for instance in contrast with the principles set out in the Code of Ethics or with applicable laws and regulations'. [Social Responsibility Report 2019, N/A: <a href="http://pradagroup.com">pradagroup.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Number grievances filed, addressed or resolved: The Company states in its 2019 Social Responsibility Report 'All the employees can communicate anonymously to the Supervisory Body through an e-mail address available on the Company's Intranet. In 2018 there were no communications of behavior that could constitute a violation of the Organizational Model, for instance in contrast with the principles set out in the Code of Ethics or with applicable laws and regulations'. Therefore, it is not clear whether there were complaints in relation to the code, or regulations, including human rights. [Social Responsibility Report 2019, N/A: <a href="http://pradagroup.com">pradagroup.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Not met: Channel is available in all appropriate languages</li> <li>• Not met: Expect AP supplier to have equivalent grievance systems</li> <li>• Not met: Opens own system to AP supplier workers</li> </ul>
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"> <li>• Not met: Grievance mechanism for community</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Describes accessibility and local languages</li> <li>• Not met: Expects AP supplier to have community grievance systems</li> <li>• Not met: AP supplier communities use global system</li> </ul>
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"> <li>• Not met: Describes how remedy has been provided: The Company has provided comments to CHRB regarding this indicator. However, this document or its content has not been found in publicly available sources [Diversity and Inclusion advisory council, N/A: <a href="http://pradagroup.com">pradagroup.com</a>]</li> <li>• Not met: Says how it would remedy key sector risks</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Changes introduced to stop repetition</li> <li>• Not met: Approach to learning from incident to prevent future impacts</li> <li>• Not met: Evaluation of the channel/mechanism</li> </ul>

## 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		No allegations meeting the CHRB severity threshold were found.

### 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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