

**Company Name** Puma  
**Industry** Apparel (Supply Chain only)  
**UNGP Core Score (\*)** 16.5 out of 26

Score	Out of	For indicators
<b>Governance and Policy Commitments</b>		
2	2	A.1.1 Commitment to respect human rights
2	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
<b>Embedding respect and Human Rights Due Diligence</b>		
Embedding respect		
2	2	B.1.1 Embedding - Responsibility and resources for day-to-day human rights functions
Human Rights Due Diligence (HRDD)		
1.5	2	B.2.1 HRDD - Identifying: Processes and triggers for identifying human rights risks and impacts
2	2	B.2.2 HRDD - Assessing: Assessment of risks and impacts identified (salient risks and key industry risks)
2	2	B.2.3 HRDD - Integrating and Acting: Integrating assessment findings internally and taking appropriate action
0	2	B.2.4 HRDD - Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts
0.5	2	B.2.5 HRDD - Reporting: Accounting for how human rights impacts are addressed
<b>Remedies and Grievance Mechanisms</b>		
1.5	2	C.1 Grievance channels/mechanisms to receive complaints or concerns from workers
2	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>16.5</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: The Company states in its Code of Conduct that 'PUMA respects Human Rights. This respect defines our engagement with societies in which we operate, and with our partners throughout our supply chain'. [Code of Conduct, 2016: <a href="http://about.puma.com">about.puma.com</a>]</li> <li>• Met: UNGC principles 1 &amp; 2: PUMA discloses that 'is committed to ensure respect of the ILO Core Conventions, the United Nations Universal Declaration of Human Rights and the ten principles of the United Nations Global Compact. These standards are the foundation for PUMA's labor-related policies. PUMA's Code of Ethics is the basic framework for the behavior of all PUMA employees including employees of joint ventures, customers and suppliers' [Modern Slavery Statement 2019, 06/2020: <a href="http://about.puma.com">about.puma.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: UNGPs: As indicated above, in the Annual report the CEO states that: 'PUMA SE remain firmly committed to the 10 principles of the United Nations Global Compact as well as the United Nations Guiding Principles of Business and Human Rights'. No new evidence found in more recent/alternative sources. [Annual report 2017, 2018: <a href="http://annual-report-2017.puma.com">annual-report-2017.puma.com</a>]</li> </ul>
A.1.2	Commitment to respect the human rights of workers	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: UNGC principles 3-6: PUMA states that 'is committed to ensure respect of the ILO Core Conventions, the United Nations Universal Declaration of Human Rights and the ten principles of the United Nations Global Compact'. [Modern Slavery Statement 2019, 06/2020: <a href="http://about.puma.com">about.puma.com</a>]</li> <li>• Met: Explicitly list ALL four ILO for AP suppliers: The Company's code of conduct for suppliers explicitly includes commitments for all ILO core areas. In relation to freedom of association and collective bargaining, the code states that 'vendors and their subcontractors must guarantee the right of their employees to join unions, or other work or industry related associations, and to bargain collectively'. [Code of conduct, 06/2016: <a href="http://about.puma.com">about.puma.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 Code of Conduct the Company states that 'all our Employees, Vendors and their Subcontractors are required to comply in full with this Code of Conduct. Where differences or conflicts arise, the highest standard shall apply'. Also, in its Code, Puma discloses about its commitment to all four ILO core standards at work. The Company discloses about no child labor, forced labor, discrimination and the right of freedom of association and collective bargaining. In relation to these, the code states 'vendors and their subcontractors [as indicated, also covers company employees] must guarantee the right of their employees to join unions, or other work or industry related associations, and to bargain collectively. These rights must be given without fear of harassment, interference or retaliation'. [Code of conduct, 06/2016: <a href="http://about.puma.com">about.puma.com</a> &amp; Code of ethics, 09/2014: <a href="http://about.puma.com">about.puma.com</a>]</li> <li>• Met: Respect H&amp;S of workers: PUMA discloses in its Sustainability Handbook - Occupational Health and Safety 'that, PUMA, its Vendors, and its Vendors' subcontractors must make every effort to provide all employees with a safe and healthy workplace. Employees are expected to support PUMA's Occupational Health and Safety ("OHS") policy, as well as adhere to all laws and regulations related to health and safety [...] We recognize that maintaining a safe and healthy work environment requires ongoing efforts. We are committed to continuously improving our performance in order to achieve these standards'. [Occupational Health and Safety, 14/02/2020: <a href="http://about.puma.com">about.puma.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Met: H&amp;S applies to AP suppliers: The code for suppliers states that 'vendors and their subcontractors must provide a safe and hygienic working environment for all employees. Vendors and their subcontractors must take all possible precautions to prevent accidents at the workplace, and should actively promote good occupational health and safety practices'. [Code of conduct, 06/2016: <a href="http://about.puma.com">about.puma.com</a>]</li> <li>• Met: working hours for workers: The code of conduct states that 'vendors and their subcontractors employees must not be obliged to work in excess of the regular workweek and maximum overtime allowed by local labor law. A regular workweek shall not exceed 48 hours and one day off shall be guaranteed for every seven-day period. Other than in exceptional circumstances, the sum of regular and overtime hours in a week shall not exceed 60 hours. Overtime shall be voluntary and compensated at a premium rate and not be requested on a regular basis'. Although the description explicitly says 'vendors and their subcontractors', the code also states that 'all our employees, vendors and their subcontractors are required to comply in full with this code of Conduct'. [Code of conduct, 06/2016: <a href="http://about.puma.com">about.puma.com</a>]</li> <li>• Met: Working hours for AP suppliers: As indicated above, the code of conduct contains commitment to labour standards on working hours. It applies to vendors and their subcontractors. [Code of conduct, 06/2016: <a href="http://about.puma.com">about.puma.com</a>]</li> </ul>
A.1.4	Commitment to engage with stakeholders	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"> <li>• Met: Commits to stakeholder engagement: The Company discloses in its Annual Report 2019 that 'Ever since our first global Stakeholder Meeting in 2003, we aim to align our sustainability program and actions with the expectations of our most relevant stakeholders. Therefore, we are constantly talking to our investors, suppliers, customers, consumers, athletes, industry peers, NGOs, scientists and of course our biggest asset, our employees. For us, a stakeholder dialogue means not shying away from inconvenient topics and admitting that we cannot solve everything on our own. It means working on these topics in close collaboration with experts and our industry peers and, of course, always in line with anti-trust regulations'. Also, in the same document, Puma states that has as target to 'continue and expand PUMAs Stakeholder Dialogue and Public Non-Financial Reporting in accordance with global standards; increase sustainability communication towards consumers'. [Business and Sustainability Report 2019 (Annual Report), 2019: <a href="http://annual-report-2019.puma.com">annual-report-2019.puma.com</a>]</li> <li>• Met: Regular stakeholder engagement: As part of the audits carried out by the sustainability team within the core suppliers, interviews take place with workers or the Company's suppliers. Also, in its Reaccreditation Report FLA, FLA indicates that PUMA 'maps and groups relevant stakeholders, including civil society organizations, based on influence and focus, which PUMA uses to prioritize engagement. PUMA has annual regional stakeholder meetings in Germany and Hong Kong and supplier roundtable meetings, where civil society organizations, like Better Work and the World Wildlife Fund, present on various topics' [Sustainability handbooks - social standards: <a href="http://about.puma.com">about.puma.com</a> &amp; Reaccreditation Report - Fair Labor Association, 2019: <a href="http://fairlabor.org">fairlabor.org</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Commits to engage stakeholders in design</li> <li>• Not met: Regular stakeholder design engagement: The Company indicates that 'Since 2003, we have invited representatives from NGOs, industry, suppliers, universities, private organizations such as WWF, bluesign®, Better Work, Borussia Dortmund, Harvard University to our stakeholder meetings. What started off as a small discussion in roundtable format has now evolved to a forward-thinking conference with members of many different organizations joining in. The intense, sometimes heated, discussions with stakeholders have always provided us with constructive feedback on our sustainability strategy and supported our progress'. Also, in its 2019 Annual Report the Company discloses that 'Ever since our first global Stakeholder Meeting in 2003, we aim to align our sustainability program and actions with the expectations of our most relevant stakeholders. Therefore, we are constantly talking to our investors, suppliers, customers, consumers, athletes, industry peers, NGOs, scientists and of course our biggest asset, our employees. For us, a stakeholder dialogue means not shying away from inconvenient topics and admitting that we cannot solve everything on our own. It means working on these topics in close collaboration with experts and our industry peers and, of course, always in line with anti-trust regulations'. However, it is not clear that the company regularly engages with affected stakeholders and their legitimate representatives in the development or monitoring of its human rights approach.</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			[Stakeholders and sustainability, 26/02/2019: <a href="http://about.puma.com">about.puma.com</a> & Business and Sustainability Report 2019 (Annual Report), 2019: <a href="http://annual-report-2019.puma.com">annual-report-2019.puma.com</a> ]
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"> <li>• Not met: Commits to remedy: The Company has provided comments to CHRB regarding this indicator. However, evidence was not material.</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Not obstructing access to other remedies: The Company has provided comments to CHRB regarding this indicator. However, evidence was not material. [Third party website, N/A: <a href="http://betterwork.org">betterwork.org</a>]</li> <li>• Not met: Collaborating with other remedy initiatives: The Company has provided comments regarding this indicator. Evidence referred to partnerships to address different issues. However, this indicator looks for specific evidence of commitment to collaborate with entities that provide access to remedy adverse impacts caused or contributed to [Reaccreditation Report - Fair Labor Association, 2019: <a href="http://fairlabor.org">fairlabor.org</a>]</li> <li>• Not met: Work with AP suppliers to remedy impacts: The Company has provided comments to CHRB regarding this indicator, including sustainability audits, Although remediation of impacts and non-compliances is part of the requirement for suppliers, no evidence found of a statement from the Company to work with the business relationship to remedy through the business relationship mechanisms or collaborating with them in the development of third party non-judicial remedies. [Reaccreditation Report - Fair Labor Association, 2019: <a href="http://fairlabor.org">fairlabor.org</a> &amp; 2019 Annual report, 2020: <a href="http://annual-report-2019.puma.com">annual-report-2019.puma.com</a>]</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	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: Commits to ILO core conventions: See indicator A.1.2. The Company is committed to each ILO core convention and to the UN Global Compact.</li> <li>• Met: Senior responsibility for HR: The Company discloses a Chart with the Sustainability organization within PUMA. This includes the 'Corporate Sustainability Steering Committee' and the head of sustainability. The FLA report indicates that the Company reorganized its structure, 'integrating the sustainability teams within the sourcing organizations. This integration allows the sustainability teams to understand better the sourcing operations and impacts on the suppliers so that the potential sustainability issues can be uncovered and discussed before they become concerns. . The four sustainability teams report directly to the Global Director of Sourcing Operations (known as SourceCo), who reports to the Chief Sourcing Officer'. [2019 Annual report, 2020: <a href="http://annual-report-2019.puma.com">annual-report-2019.puma.com</a> &amp; Reaccreditation Report - Fair Labor Association, 2019: <a href="http://fairlabor.org">fairlabor.org</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Day-to-day responsibility: The Company discloses a chart in its Annual report showing sustainability structure (that include human rights). In the FLA reaccreditation report it is indicates that 'the four-member Corporate Sustainability Team is lead by the Head of Corporate Sustainability and is focused on corporate-level strategies and undertaking projects, including global civil society engagement and the integration of data from third party platforms into PUMA datasets. [2019 Annual report, 2020: <a href="http://annual-report-2019.puma.com">annual-report-2019.puma.com</a> &amp; Reaccreditation Report - Fair Labor Association, 2019: <a href="http://fairlabor.org">fairlabor.org</a>]</li> <li>• Met: Day-to-day responsibility for AP in supply chain: The Company discloses a chart in its Annual report showing sustainability structure (that include human rights). The FLA report clarifies the following: 'PUMA has three teams focused on factory-level compliance: the Social Sustainability Team has nine staff who report to the Team Head for Social Sustainability, the Environmental Team has five staff who report to the Team Head for Environmental Sustainability, and the Chemical Team has three staff, led by the Senior Manager, Chemical Sustainability. The Social Sustainability Team is responsible for social compliance-related tasks including social compliance audits, remediation follow-ups and special projects'. [Reaccreditation Report - Fair Labor Association, 2019: <a href="http://fairlabor.org">fairlabor.org</a> &amp; 2019 Annual report, 2020: <a href="http://annual-report-2019.puma.com">annual-report-2019.puma.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.1	Identifying: Processes and triggers for identifying human rights risks and impacts	1.5	<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: Identifying risks in own operations: The Company indicates, in its 2018 Annual Report, that 'PUMA has introduced a compliance management system (CMS) to identify, control and monitor compliance risks at an early stage'. Also, in its Annual Report 2019, the Company refers to Supply Chain Human Rights Risk Assessments. The Company also informs that a Corporate Level Human Rights Risk assessment was made in 2016 and 2017. The results of this assessment were published in 2016 PUMA Annual Report. In addition, Puma discloses that 'In order to be able to fulfil our Human Rights target, we have built on the results of our Human Rights screening from 2015 and engaged the expert organisation twentyfifty to help us with conducting a Human Rights assessment. Since most of our work in the field of Human Rights so far has focused on the supply chain, we conducted this Human Rights assessment for our own entities in 2016. The results of our assessment show that overall we have managed the Human Rights topic well, but it has also identified some weak spots, such as contracted labour or the coverage of Human Rights in our marketing and sponsorship activities'. The Company discloses about its main risks related to its own operations, which are: Employee rights, environment, health &amp; safety, privacy and data security, business partners, costumers and product safety, marketing and sales, sponsorship, communities and broader society, integrity and anti-corruption. [2018 Annual Report Sustainability, 01/03/2019: <a href="http://annual-report-2018.puma.com">annual-report-2018.puma.com</a> &amp; Annual Report 2016, 2017: <a href="http://about.puma.com">about.puma.com</a>]</li> <li>• Met: Identifying risks in AP suppliers: The Company listed the material topics and indicates that in 2017 it carried out a human rights risk assessment and took the steps to mitigate the risks identified. It also assessed the Company's capacity to apply human rights due diligence concept and identify hotspots where further action is required. [Annual report 2017, 2018: <a href="http://annual-report-2017.puma.com">annual-report-2017.puma.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Ongoing global risk identification: As indicated above, the Company is carrying out the process for risk identification and assessment in they supply chain. [Business and Sustainability Report 2019 (Annual Report), 2019: <a href="http://annual-report-2019.puma.com">annual-report-2019.puma.com</a> &amp; 2018 Annual Report Sustainability, 01/03/2019: <a href="http://annual-report-2018.puma.com">annual-report-2018.puma.com</a>]</li> <li>• Met: In consultation with stakeholders: The Company indicates that as part of its actions to identify and mitigate risks, it carries out due diligence and assessments which include: 'The identification of regional specific Human Rights risks engaging in an active dialogue with local stakeholders including NGOs, unions and suppliers'. [2018 Modern Slavery and Human Trafficking Statement, 07/2019: <a href="http://about.puma.com">about.puma.com</a>]</li> <li>• Met: In consultation with HR experts: The Company consulted with a consultancy firm and its diagnostic tool which also helped identify the Company's capacity to apply due diligence and identify hotspots for the Company to improve its system. [Annual report 2017, 2018: <a href="http://annual-report-2017.puma.com">annual-report-2017.puma.com</a>]</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)	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: Salient risk assessment (and context): The Company discloses the prevalent human rights risks in the garment and footwear sector and the PUMA capacity level to the different aspects of the due diligence processes (embedding conduct, mapping impacts and risks, mitigating impacts, audit, grievance mechanisms and collaborating). It indicates that 'in 2017 we expanded our human rights risk assessment to the supply chain and took steps to mitigate the risks identified, for example in the area of cotton farming via our membership to the Better Cotton Initiative. [Annual report 2017, 2018: <a href="http://annual-report-2017.puma.com">annual-report-2017.puma.com</a>]</li> <li>• Met: Public disclosure of salient risks: The Company discloses which are the prevalent human rights risks in its sector, including forced resettlements, child labour, freedom of association and collective bargaining, wages below living wage levels, excessive overtime, forced labour and sexual harassment and gender-based violence. It also indicates that the results of the assessment shows that 'PUMA is pro-actively embedding responsible business conduct in its management processes as well as collaborating with other peers and industry initiatives. On the other hand, practices regarding mapping and assessing risks and impacts in the lower tiers of the supply chain are still reactive and need to be better integrated at the strategic level. The Company discloses a chart showing identified risk areas in the cotton supply chain in India. The Company also discloses the main challenges and how it is facing them. [Annual report 2017, 2018: <a href="http://annual-report-2017.puma.com">annual-report-2017.puma.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			Score 2 <ul style="list-style-type: none"> <li>Met: Both requirements under score 1 met</li> </ul>
B.2.3	Integrating and Acting: Integrating assessment findings internally and taking appropriate action	2	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Met: Action Plans to mitigate risks: The Company discloses a list of challenges that is facing and how it is responding to them. 'Low minimum wage levels leading to incentives of excessive overtime: regular monitoring of wage rates in our factories in comparison to minimum wages'; 'Immature industrial relations leading to anti-union bias among many employers: Freedom of association training for factory management'; 'Inadequate local infrastructure, such as public transport systems: Membership of the Cambodia Road Safety initiative'. [Annual report 2017, 2018: <a href="https://www.puma.com/annual-report-2017.puma.com">annual-report-2017.puma.com</a>]</li> <li>Met: Including in AP supply chain: System and action plans describe actions taken in relation to the supply chain. [Annual report 2017, 2018: <a href="https://www.puma.com/annual-report-2017.puma.com">annual-report-2017.puma.com</a>]</li> <li>Met: Example of Actions decided: As indicated above, following the assessment the Company discloses the challenges that it faces and examples of measures being implemented to deal with them. Another example is the risk of farming cotton in the supply chain in India, which entails the action plan of expand coverage of Better Cotton Initiative via its membership to the initiative. [Annual report 2017, 2018: <a href="https://www.puma.com/annual-report-2017.puma.com">annual-report-2017.puma.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Met: Both requirements under score 1 met [Annual report 2017, 2018: <a href="https://www.puma.com/annual-report-2017.puma.com">annual-report-2017.puma.com</a>]</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: The Company indicates that 'since any audit or assessment can only analyze the compliance situation at a given time, we use two other tools to manage and track performance of our suppliers: PUMA Code of Conduct posters, including a worker hotline, and PUMA Supplier Social Key Performance Indicators (KPIs)'. Also, in its Annual report 2019, the Company informs that 'during 2019 we identified 3 zero tolerance issues and were able to remedy all of them'. This identification was made through a compliance mechanism from workers and audits. However, this indicator looks for a description of a system to track actions taken in response to human rights risks and impacts assessed and for evaluating the effectiveness of previously determined actions to see how well the salient risks are addressed and taking further actions. [2019 Consolidated Financial Statements, 18/02/2020: <a href="https://www.puma.com/about.puma.com">about.puma.com</a> &amp; Business and Sustainability Report 2019 (Annual Report), 2019: <a href="https://www.puma.com/annual-report-2019.puma.com">annual-report-2019.puma.com</a>]</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	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Met: Comms plan re identifying risks: See indicator B.2.1. The Company carries out a global risk identification and assessment process that includes both its own operations and business partners, and describes at least some features of the process.</li> <li>Met: Comms plan re assessing risks: See indicator B.2.2.</li> <li>Met: Comms plan re action plans for risks: See indicator B.2.3.</li> <li>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</li> <li>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 [Business and Sustainability Report 2019 (Annual Report), 2019: <a href="https://www.puma.com/annual-report-2019.puma.com">annual-report-2019.puma.com</a>]</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	1.5	<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: Channel accessible to all workers: In its Annual report 2019 the Company informs that 'operate a PUMA worker compliance hotline. Phone numbers and email addresses of this hotline are visible on our Code of Conduct posters, which are displayed at every PUMA supplier globally. We also use social media such as WeChat to connect with workers and have established more formalized compliance and HR apps at selected core suppliers.' [Business and Sustainability Report 2019 (Annual Report), 2019: <a href="https://www.puma.com/annual-report-2019">annual-report-2019.puma.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Number grievances filed, addressed or resolved: In its Annual Report 2017 and the report in know the chain, regarding relation to supply chain social compliance, Puma discloses that, in 2017, it received 81 grievances from workers (three of which concerned zero-tolerance issues), which included topics such as fair compensation (43%), employment relationship (35%), and excessive working hours (7%). It further discloses it received ten grievances from third-party organizations, which focused on topics including freedom of association and fair compensation. However, this data refers only to supply chain, no further evidence was found in relation to number human rights grievances filed, addressed or resolved in its own operations. In its Annual report 2019, the Company discloses that 'operates a PUMA worker compliance hotline. Phone numbers and email addresses of this hotline are visible on our Code of Conduct posters, which are displayed at every PUMA supplier globally'[...] In total, 61 complaint issues across 7 countries were raised to PUMA's feedback system. 100% were resolved by our team'. However, there is no description about the number of complaints related to human rights, in its own operations, received, addressed or solved. [Know the chain scorecard 2018, 2018: <a href="https://www.knowthechain.org">knowthechain.org</a> &amp; Business and Sustainability Report 2019 (Annual Report), 2019: <a href="https://www.puma.com/annual-report-2019">annual-report-2019.puma.com</a>]</li> <li>• Not met: Channel is available in all appropriate languages: Puma's code of conduct describes that the hotline handles calls from employees in Philippines, Vietnam, Indonesia, Bangladesh, Turkey, English, French, German, Spanish, Dutch and Chinese and that the 'Code is available in the languages most commonly spoken in the Group'. However, it is not clear if these languages cover all Countries in which the Company operates. [Code of Conduct, 2016: <a href="https://www.puma.com/about">about.puma.com</a>]</li> <li>• Met: Expect AP supplier to have equivalent grievance systems: The social handbook for suppliers establishes the formal complaint process and describes the different steps to follow. The document also indicates that 'all PUMA factories are contractually bound to pursue business relationships only with Subcontractors that are in compliance with the Handbooks'. [Sustainability handbooks - social standards: <a href="https://www.puma.com/about">about.puma.com</a>]</li> <li>• Met: Opens own system to AP supplier workers: The social handbook also indicates that 'PUMA offers a confidential, third-party complaints/grievance management process for workers to voice concerns'. Contact numbers and email address of the PUMA sustainability team are displayed in each factory producing for PUMA: 'this information must be provided in the local language and be readily accessible to the workers'. [Sustainability handbooks - social standards: <a href="https://www.puma.com/about">about.puma.com</a>]</li> </ul>
C.2	Grievance channel(s)/mechanism(s) to receive complaints or concerns from external individuals and communities	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: Grievance mechanism for community: The Company describes that accepts third party complaints through various channels. The Company's Group-wide electronic whistleblower platform, which is operated by an external provider and to which employees and third parties can report protected illegal and unethical conduct. [Code of Conduct, 2016: <a href="https://www.puma.com/about">about.puma.com</a> &amp; Business and Sustainability Report 2019 (Annual Report), 2019: <a href="https://www.puma.com/annual-report-2019">annual-report-2019.puma.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Describes accessibility and local languages: The Company state that its worldwide hotline is available to all in the 12 languages into which the code is translated. [Code of Conduct, 2016: <a href="https://www.puma.com/about">about.puma.com</a>]</li> <li>• Met: AP supplier communities use global system: The social handbook states that complaints can be raised through the PUMA Sustainability Team: 'PUMA offers confidential, third-party complaints/grievance management process for workers to voice concerns as well as third parties (supply chain context). [Sustainability handbooks - social standards: <a href="https://www.puma.com/about">about.puma.com</a>]</li> </ul>

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"> <li>• Not met: Describes how remedy has been provided: The Company has provided comments to CHRB regarding this indicator. However, it seemed to refer to evaluation of mechanisms, rather than remedy provided. See below.</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: In its reaccreditation report for Fair Labor Association, Puma discloses that 'reviews and analyzes the effectiveness of grievance mechanisms through its audit tool; in response to low levels of worker grievances, the Social Sustainability Team launched a worker voice program at two facilities in China with the service provider Microbenefits. This program, covering nine core suppliers in China as of 2018, incorporates online training, worker surveys, and HR involvement, and PUMA plans to expand its reach to all core suppliers in China. Between 2018 and 2019, 11 facilities in China and four in Vietnam launched this program. Through this program, PUMA learned of a worker grievance regarding forced overtime. In response, PUMA visited the factory and met directly with workers and factory management to resolve this issue'. [Reaccreditation Report - Fair Labor Association, 2019: <a href="https://www.fairlabor.org">fairlabor.org</a>]</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		<ul style="list-style-type: none"> <li>• <b>Headline:</b> Cambodian factory workers suffer mass faintings</li> <li>• <b>Area:</b> H&amp;S and Working hours</li> <li>• <b>Story:</b> In June 2017, The Observer and Danish investigative media site Danwatch reported that more than 500 workers in four factories have been hospitalised over the previous year. Women who collapsed worked 10 hour days, six days a week and the temperature in the factories hit 37 degrees celsius.</li> </ul> <p>Workers interviewed as part of the investigation also described 28 people collapsing as they rushed to escape a fire at a factory supplying Nike and thick smoke in a factory supplying Puma.</p> <p>Puma, Nike, VF Corporation and Asics were contacted by the Observer and said they had investigated the episodes. Puma said it was working with Better Factories Cambodia (BFC), as well as recommending medical checks, maintenance of ventilation systems and a worker management committee.</p> <ul style="list-style-type: none"> <li>• Sources: [Danwatch - 25/06/2017: <a href="http://old.danwatch.dk">old.danwatch.dk</a>][The Guardian - 25/06/2017: <a href="http://theguardian.com">theguardian.com</a>]</li> </ul>
E(1).1	The Company has responded publicly to the allegation	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: Public response available: Puma has reportedly investigated the allegations at its own facilities and at its supplier facilities but reports that there were no more incidents of mass fainting. [HRN calls for improvements in working conditions and prevention measures, 06/03/2018: <a href="http://hrn.or.jp">hrn.or.jp</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Response goes into detail: Puma's investigation into its own facilities resulted in a commitment to conducting regular ventilation systems checks in supplier factories. Its response to the allegations included recommendations which include "providing energy bars and medical checks, maintenance of the ventilation system and a worker management committee." Additionally, the company stated that it was working with Better Factories Cambodia, which is a partnership between the United Nations labour organisation and the International Finance Corporation. [HRN calls for improvements in working conditions and prevention measures, 06/03/2018: <a href="http://hrn.or.jp">hrn.or.jp</a> &amp; Cambodian female workers in Nike, Asics and Puma factories suffer mass faintings, 24/06/2017: <a href="http://theguardian.com">theguardian.com</a>]</li> </ul>
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"> <li>• Met: Company policies address the general issues raised: Puma's social and labour compliance standards are based on the ILO Core Conventions, the UNGPs and the UNGC's 10 principles. The company's social and labour compliance standards includes a policy on working hours and rest days which elaborates upon general requirements and overtime regulations Puma considers regular working hours violation as a "major issue" and expects suppliers to remediate issues with immediate action or within a reasonable timeframe. In regards to health and</li> </ul>



Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>safety, the company states "...it is our duty to ensure that these products are manufactured in workplaces where human rights are respected and workers' health and safety as well as the environment are protected. [Codes and handbooks, 26/02/2019: <a href="http://about.puma.com">about.puma.com</a> &amp; Sustainability handbooks - social standards: <a href="http://about.puma.com">about.puma.com</a>]</p> <ul style="list-style-type: none"> <li>• Met: Policies apply to the type of business relationships involved: The company makes clear that its policies apply to employees, vendors and subcontractors. Additionally, "PUMA takes on the responsibility for everybody involved in the production process, whether a PUMA employee or not." [Code of ethics, 09/2014: <a href="http://about.puma.com">about.puma.com</a> &amp; Sustainability handbooks - social standards: <a href="http://about.puma.com">about.puma.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Policies address the specific rights in question: In regards to working hours, the company states: "Vendors and their subcontractors employees must not be obliged to work in excess of the regular workweek and maximum overtime allowed by local labor law. A regular workweek shall not exceed 48 hours and one day off shall be guaranteed for every seven-day period. Other than in exceptional circumstances, the sum of regular and overtime hours in a week shall not exceed 60 hours. Overtime shall be voluntary and compensated at a premium rate and not be requested on a regular basis." In regards to health and safety, the company states: "Vendors and their subcontractors must provide a safe and hygienic working environment for all employees. Vendors and their subcontractors must take all possible precautions to prevent accidents at the workplace, and should actively promote good occupational health and safety practices." Additionally, PUMA provides qualitative information on health and safety related to injury rates and fatalities. [Codes and handbooks, 26/02/2019: <a href="http://about.puma.com">about.puma.com</a> &amp; Annual report 2017, 2018: <a href="http://annual-report-2017.puma.com">annual-report-2017.puma.com</a>]</li> </ul>
E(1).3	The Company has taken appropriate action	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Encourages linked business to engage affected stakeholders: PUMA states that it recommended to suppliers to provide "energy bars and medical checks, maintenance of the ventilation system and a worker management committee." Additionally, the company stated that it was working with Better Factories Cambodia, which is a partnership between the United Nations labour organisation and the International Finance Corporation. [HRN calls for improvements in working conditions and prevention measures, 06/03/2018: <a href="http://hrn.or.jp">hrn.or.jp</a> &amp; Codes and handbooks, 26/02/2019: <a href="http://about.puma.com">about.puma.com</a>]</li> <li>• Not met: Provides remedies to affected stakeholders: Though the company submitted evidence of remedy, this is not a public document and therefore cannot be awarded points here.</li> <li>• Not met: Has reviewed management systems to prevent recurrence: Though the company submitted evidence of management systems review, this is not a public document and therefore cannot be awarded points here.</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Remedies are satisfactory to the victims: See above</li> <li>• Not met: Has improved systems and engaged affected stakeholders: see above</li> </ul>

## Disclaimer

A score of zero for a particular indicator does not mean that bad practices are present. Rather it means that we have been unable to identify the required information in public documentation.

See the 2020 Key Findings report and the 2019 technical annex for more details of the research process.

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