

Company Name Ralph Lauren Corporation
Industry Apparel (Supply Chain only)
UNGP Core Score (*) 6.0 out of 26

Score	Out of	For indicators
Governance and Policy Commitments		
1	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
0.5	2	A.1.5 Commitment to remedy
Embedding respect and Human Rights Due Diligence		
Embedding respect		
0.5	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
1	2	C.7 Remedying adverse impacts and incorporating lessons learned
6.0	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	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: UNGC principles 1 & 2: The Company is a participant of UNGC since 2019. [UNGC Letter of Commitment, 06/2019: s3-us-west-2.amazonaws.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: UNGPs • Not met: OECD
A.1.2	Commitment to respect the human rights of workers	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: ILO Core: The Company discloses in its Operating Guidelines that Ralph Lauren and its affiliates are dedicated to conduct its operations throughout the world on principles of ethical business practices. In its document the Company states that it must not use child labor, does not work with forced labor, does not practice any form of discrimination and should respect the legal rights of employees to freely, and without harassment, participate in organizations of their choice and to bargain collectively. [Operating Guideline, 03/2020: corporate.ralphlauren.com] • Not met: UNGC principles 3-6 • Met: Explicitly list ALL four ILO for AP suppliers: The Company states on its Website that requires all suppliers, factories, and contractors to adhere Company's Operating Guidelines in which is mentioned freedom of association and collective bargaining, prohibitions on child labor, forced labor, prison labor, discrimination, and harassment. With respect freedom of association and collective bargaining, the Company indicates: 'Suppliers should respect the legal rights of employees to freely, and without harassment, participate in organizations of their choice and to bargain collectively. Where the right to freedom of association and collective bargaining is restricted under law, the supplier allows the development of parallel means for independent and free association and bargaining.' [Operating Guideline, 03/2020: corporate.ralphlauren.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Explicit commitment to All four ILO Core: The Company discloses in its Operating Guidelines that Ralph Lauren and its affiliates are dedicated to conduct its operations throughout the world on principles of ethical business practices. In its document the Company states that suppliers must not use child labor, does not work with forced labor, does not practice any form of discrimination and 'should respect the legal rights of employees to freely, and without harassment, participate in organizations of their choice and to bargain collectively. Where the right to freedom of association and collective bargaining is restricted under law, the supplier allows the development of parallel means for independent and free association of bargaining.' [Operating Guideline, 03/2020: corporate.ralphlauren.com] • Met: Respect H&S of workers: The Company states in its Operating Guideline that it must ensure that it provides a safe and healthy work environment for the employees, and they are not subject to unsanitary or hazardous conditions. [Operating Guideline, 03/2020: corporate.ralphlauren.com] • Met: H&S applies to AP suppliers: The Company discloses in its Operating Guideline that business partners must ensure that their employees are provided a safe and healthy work environment, and are not subject to unsanitary or hazardous conditions. [Operating Guideline, 03/2020: corporate.ralphlauren.com] • Not met: working hours for workers: The Company states in its Operating Guideline that 'employees must not be required to work excessive working hours and overtime and have at least one day off in seven'. However, no reference found to standard working hours. The Company has provided comments to CHRB

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			<p>regarding this indicator. However, evidence was not material. [Operating Guideline, 03/2020: corporate.ralphlauren.com]</p> <ul style="list-style-type: none"> • Not met: Working hours for AP suppliers: The statement above apply also for suppliers. However, no reference found to standard working hours. The Company has provided comments to CHRB regarding this indicator. However, evidence was not material. [Operating Guideline, 03/2020: corporate.ralphlauren.com]
A.1.4	Commitment to engage with stakeholders	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 stakeholder engagement • Not met: Regular stakeholder engagement: The Company states under the section Materiality and Stakeholder Engagement : 'In FY19, we conducted a materiality assessment to help identify and prioritize the sustainability issues, risks and opportunities that matter the most to our business and stakeholders. The assessment was conducted by a third party and included extensive engagement with internal and external stakeholders including employees, selected licensees, suppliers, partners, NGOs and consumers'. Additionally, it indicates: 'In FY20, we launched our new Supplier Engagement Strategy to establish and maintain collaborative partnerships and systems that foster increased transparency and accountability' and 'As part of our Supplier Engagement Strategy, we maintain long-standing relationships with our strategic and key suppliers, enabling us to partner closely and transparently for the benefit of the people who make our garments'. However, no evidence found that the company regularly engages with potentially and actually affected stakeholders. [2020 Global Citizenship & Sustainability Report, 04/20: corporate.ralphlauren.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Commits to engage stakeholders in design • Not met: Regular stakeholder design engagement: The Company discloses In its Corporate Responsibility Report that commits to consulting with key stakeholders in the development and implementation of its policies and plans to publicly report on implementation targets and outcomes. Moreover, on its 2020 Global Citizenship Sustainability Report Standard Supplement, the Company indicates: 'We engage with our stakeholders at varying frequencies and in different formats to inform our citizenship and sustainability strategy'. However, no evidence found that the company engages with stakeholders on the design of their human rights approach. [2017 Corporate Responsibility Report, 03/2018: careers.ralphlauren.com & 2020 Global Citizenship Sustainability Report Standard Supplement, 2020: corporate.ralphlauren.com]
A.1.5	Commitment to remedy	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"> • Not met: Commits to remedy: The Company discloses that it performs audits, visits and remediation on the supplier's production operations. Moreover, it indicates: 'Upon completion of the investigation, if necessary and supported by the facts of the investigation, remedial action will be taken against the individual who is the subject of a complaint'. However, no evidence found of a Company's commitment to remedy the adverse impacts on individuals, workers and communities that it has caused or contributed to. [Global People Practices Fair Treatment Policy, N/A: secure.ethicspoint.com & 2020 Global Citizenship Sustainability Report Standard Supplement, 2020: corporate.ralphlauren.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: The Company indicates: 'During the year, independent third-party remedial experts started nine long-term capability building remediation programs to confirm that corrective action was implemented and to provide trainings and support where needed'. However, it is not clear how and with whom the company is collaborating with on this process. [2020 Global Citizenship & Sustainability Report, 04/20: corporate.ralphlauren.com] • Met: Work with AP suppliers to remedy impacts: Ralph Lauren discloses that works to help its suppliers to remedy the compliance issue with the help of its third-party service providers. The Company also states that "will engage our suppliers and other supply chain partners to remediate practices that do not meet our policy, within a 6- to 12-month time frame". In addition, the Company states that "prefer to work with our contracted factories to remediate and improve rather than terminate our business partnership". [2017 Corporate Responsibility Report, 03/2018: careers.ralphlauren.com & 2017 Corporate Responsibility Report, 03/2018: careers.ralphlauren.com]

Embedding Respect and Human Rights Due Diligence

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.1	Responsibility and resources for day-to-day human rights functions	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: Commits to ILO core conventions: See indicator A.1.2. The Company is committed to ILO conventions. [Operating Guideline, 03/2020: corporate.ralphlauren.com] • Not met: Senior responsibility for HR: The Company indicates the management of Human rights issues as one of the Nominating, Governance, Citizenship & Sustainability Committee's responsibilities. Also, on its website its disclosed the chairperson and other members of the committee. However, no evidence related to senior management responsibility for human rights, scope of the indicator. [Nominating, Governance, Citizenship & Sustainability Committee Of the Board of Directors, 16/05/2019: investor.ralphlauren.com & Corporate Governance, N/A: investor.ralphlauren.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Day-to-day responsibility: The Company indicates: 'Our Global People Practices team upholds the Company's Fair Treatment Policy, managing: Workplace Compliance, ensuring compliance with laws and regulations, people-related policy and training, Progressive Work Practices [...] and Safe and Impartial Review [...]'. In addition, the Company state 'our Fair Treatment Policy helps us maintain a professional and productive Ralph Lauren work environment that is free from discrimination and harassment.' [2020 Global Citizenship & Sustainability Report, 04/20: corporate.ralphlauren.com] • Met: Day-to-day responsibility for AP in supply chain: The Company state that 'from the first day a factory starts work for us, our social compliance program seeks to protect the rights of workers. We monitor compliance with our Operating Standards through independent third-party audits together with audits conducted by our in-house team and assessments from Better Work. [2020 Global Citizenship & Sustainability Report, 04/20: corporate.ralphlauren.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: Although the Company has an evaluation of social, environmental, and governance risks associated with the specific sources and prioritization of high-risk sources for additional due diligence, verification, and action; it does not explicitly mention human rights risks, or whether it identifies human-right related risks in its own operations. No further evidences found in the last report. [2017 Corporate Responsibility Report, 03/2018: careers.ralphlauren.com & 2019 Global citizenship & Sustainability Report, 2019: corporate.ralphlauren.com] • Not met: Identifying risks in AP suppliers: The Company indicates: 'We respect universally accepted human rights and assess our supply chain for risks including forced labor, human trafficking, deceptive recruiting and child labor'. However, no description found of a process to identify its human rights risks and impacts in specific locations or activities, through relevant business relationships. The Company provided comments to CHRB regarding this indicator. However, evidence was not material. [2020 Global Citizenship & Sustainability Report, 04/20: corporate.ralphlauren.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Ongoing global risk identification • Not met: In consultation with stakeholders: The Company provided comments to CHRB regarding this indicator. However, no evidence found that the Company consults in relation to potential human rights impacts and risks in the context of 'biannual supplier summits'. [2020 Global Citizenship & Sustainability Report, 04/20: corporate.ralphlauren.com] • Not met: In consultation with HR experts: The Company provided comments to CHRB regarding this indicator. However, evidence was not material, as seems to refer to third party social audit firms performing compliance monitoring. [2020 Global Citizenship & Sustainability Report, 04/20: corporate.ralphlauren.com] • Not met: Triggered by new circumstances

Indicator Code	Indicator name	Score (out of 2)	Explanation
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"> • Not met: Salient risk assessment (and context) • Not met: Public disclosure of salient risks: The Company indicates: ‘Migrant and foreign migrant workers can be particularly vulnerable to exploitation and unfair employment terms. Because of this, we have a robust Foreign Migrant Worker Policy to secure fair employment terms for these groups, no matter which country they have travelled from to seek work’. However, it is not clear if those are company's salient risks and no evidence found on the Company publicly disclosing the salient risks identified in its assessments, which may be aggregated across its operations and locations. [2020 Global Citizenship & Sustainability Report, 04/20: corporate.ralphlauren.com] Score 2 <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	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Action Plans to mitigate risks: The Company has provided comments to CHRB regarding this indicators, including social compliance audits and corrective actions. However, this indicator looks for evidence of a risk-approach followed to mitigate the different salient issues that the Company faces. Current evidence focus in compliance monitoring and corrective action plans in cases non-compliances are found. • Not met: Including in AP supply chain • Not met: Example of Actions decided Score 2 <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	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: System to check if Actions are effective: The Company indicates it has a ‘Social Compliance Program and Better Work Assessments’, which includes, for example, ‘Social audit for compliance with Operating Standards’ and ‘Social audits in specific countries where the Better Work program operates’. The Company also states: ‘We expect to see progressive improvement in standards across our supply chain, implemented pro-actively by our suppliers. We create risk segments within our suppliers based on their audit results’ and provides a chart with factory ratings. However, no evidence was found on the Company’s overall monitoring system to track the effectiveness of the actions taken to address human rights risks and impacts. By tracking, CHRB means reviewing the effectiveness of previously determined actions to see how well they are addressing the salient risks and taking further actions if the results of the assessment require it. [2020 Global Citizenship & Sustainability Report, 04/20: corporate.ralphlauren.com] • Not met: Lessons learnt from checking effectiveness: As above. The Company indicates: ‘In Cambodia, The Better Factories program identified a pattern of repeat issues, where remediation was often temporary, and the same problem would recur in a subsequent audit. We held a full day summit for Cambodia suppliers to explain our social compliance and Operating Standards in detail and discuss strategies for improving and maintaining compliance at factories. We encouraged them to lower their rating by one full category within a year—factories failing to achieve this will be required to participate in additional remediation and capability training’. However, it is not clear if actions have been effective. [2020 Global Citizenship & Sustainability Report, 04/20: corporate.ralphlauren.com] Score 2 <ul style="list-style-type: none"> • Not met: Both requirement under score 1 met
B.2.5	Communicating : Accounting for how human rights impacts are addressed	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Comms plan re identifying risks: In order to be awarded this indicator, the Company needs to achieve at least 1,5 points in B.2.1 • Not met: Comms plan re assessing risks: In order to be awarded this indicator, the Company has to achieve a full score in B.2.2 • Not met: Comms plan re action plans for risks: In order to be awarded this indicator, the Company has to achieve a full score in B.2.3 • Not met: Comms plan re reviewing action plans: In order to be awarded this indicator, the Company has to achieve a full score in B.2.4 • Not met: Including AP suppliers: In order to be awarded this indicator, the Company has to achieve a full score in B.2.2/B.2.3/B.2.4 and at least 1,5 points in B.2.1

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> Not met: Responding to affected stakeholders concerns: The Company indicates that 'we also communicate regularly with investors on ESG issues, typically either through the regular course of investor meetings or one off meeting requests'. However, this indicator looks for evidence of how the Company responded in terms of communication to specific concerns raised by affected stakeholders. [2020 Global Citizenship Sustainability Report Standard Supplement, 2020: corporate.ralphlauren.com] 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 has a hotline and a website operated by a third party to ensure that employees have a safe and impartial place to bring their concerns in which anyone can make complaints. [2017 Corporate Responsibility Report, 03/2018: careers.ralphlauren.com & Ralph Lauren Ethics point, Checked on 4/1/19: secure.ethicspoint.com] <p>Score 2</p> <ul style="list-style-type: none"> Not met: Number grievances filed, addressed or resolved Met: Channel is available in all appropriate languages: The grievance mechanisms are available in all appropriate languages. [Ralph Lauren Ethics point, Checked on 4/1/19: secure.ethicspoint.com] Not met: Expect AP supplier to have equivalent grievance systems: The Company indicates: 'Our Operating Standards are the basis for our relationship with suppliers, communicating our standards across legal and ethical matters, labor, animal welfare and environmental compliance. [...] In FY20, we strengthened our Operating Standards to require factories to have formal grievance mechanisms in place'. However, no evidence found on the Company expecting its suppliers to establish a channel/mechanism for workers to raise complaints or concerns related to the supplier or their operations. [2020 Global Citizenship & Sustainability Report, 04/20: corporate.ralphlauren.com] Not met: Opens own system to AP supplier workers: The Company indicates: 'NAVEX Global is an independent company selected by Ralph Lauren to provide secure, confidential telephone and web-based systems for use by Ralph Lauren employees, customers, vendors and applicants who wish to report a concern regarding business conduct or a suspected violation of company policy or local laws and regulations'. However, there is no evidence that suppliers' workers have access to the Company's own channel to raise complaints or concerns about the Company's suppliers. [About the Ralph Lauren Hotline (FAQs), 2020: secure.ethicspoint.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 indicates: "'NAVEX Global is an independent company selected by Ralph Lauren to provide secure, confidential telephone and web-based systems for use by Ralph Lauren employees, customers, vendors and applicants who wish to report a concern regarding business conduct or a suspected violation of company policy or local laws and regulations'. However, it is not clear whether it is accessible to all external individuals and communities who may be adversely impacted by the Company to raise complaints/concerns, including about human rights issues related to the Company. [About the Ralph Lauren Hotline (FAQs), 2020: secure.ethicspoint.com] <p>Score 2</p> <ul style="list-style-type: none"> Not met: Describes accessibility and local languages Not met: Expects AP supplier to have community grievance systems Not met: AP supplier communities use global system
C.7	Remedying adverse impacts and incorporating lessons learned	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: Describes how remedy has been provided: The Company indicates: 'Our social auditing protocol includes foreign migrant worker interviews to verify compliance with our Policy. In FY20, our monitoring identified issues with two factories in Taiwan, where the law permits agents to charge workers fees. Our Policy provides protection above the Taiwanese legal requirement, and we therefore took action to eliminate this practice at the two factories. One factory has since stopped producing for us and was removed from our approved finished goods factory list. The second factory has changed its practices and is now paying

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>the fees, so the workers are not charged. We will monitor compliance going forward and the factory's continued relationship with us will be contingent on full compliance'. [2020 Global Citizenship & Sustainability Report, 04/20: corporate.ralphlauren.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Changes introduced to stop repetition: The Company indicates: 'We targeted our capability building training events to help suppliers in regions where there is a shared compliance problem. In FY20, we held two summits for suppliers, targeting regional issues. In Cambodia, The Better Factories program identified a pattern of repeat issues, where remediation was often temporary, and the same problem would recur in a subsequent audit. We held a full day summit for Cambodia suppliers to explain our social compliance and Operating Standards in detail and discuss strategies for improving and maintaining compliance at factories. We encouraged them to lower their rating by one full category within a year—factories failing to achieve this will be required to participate in additional remediation and capability training.' However, no evidence on the Company describing changes to systems and procedures to prevent similar adverse impacts in the future, for adverse human rights impacts which it has caused or to which it has contributed. [2020 Global Citizenship & Sustainability Report, 04/20: corporate.ralphlauren.com] • 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		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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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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