

**Company Name** Salvatore Ferragamo  
**Industry** Apparel (Supply Chain only)  
**UNGP Core Score (\*)** 4.0 out of 26

Score	Out of	For indicators
<b>Governance and Policy Commitments</b>		
1	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
<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>		
1.5	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
<b>4.0</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	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: General HRs commitment: The Company declares that 'This document consolidates the Group's commitment to fully respecting human rights and the rights of its employees as recognized by national and international conventions and declarations as part of its operations'. Also, The Salvatore Ferragamo Group discloses that 'is committed to conducting all its activities in accordance with Human and Workers' Rights, as acknowledged by national and international conventions and declarations'. [Sustainability report 2018, 27/03/2019: <a href="http://csr.ferragamo.com">csr.ferragamo.com</a> &amp; Sustainability Policy, 2017: <a href="http://csr.ferragamo.com">csr.ferragamo.com</a>]</li> <li>• Met: UNGC principles 1 &amp; 2: In order to implement the universal principles of sustainability and support the United Nations' goals, in December 2018, the Salvatore Ferragamo Group joined the United Nations Global Compact. [Sustainability report 2018, 27/03/2019: <a href="http://csr.ferragamo.com">csr.ferragamo.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: UNGPs</li> <li>• Not met: OECD</li> </ul>
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"> <li>• Met: ILO Core: The Company states that 'In particular, in accordance with the provisions of the SA8000 Standard, Salvatore Ferragamo S.p.A. Is committed to [...] refusing the use of child labour [...] refusing the use of forced and compulsory labour [...] protecting the health and safety of workers and their well-being [...] respecting freedom of association and collective bargaining. This implies respecting and protecting workers' freedom of association, not hindering their membership in trade unions and promoting collective bargaining. [...] respecting the principles of dignity, equality and non-discrimination. [SA8000 Policy, 24/04/2019: <a href="http://group.ferragamo.com">group.ferragamo.com</a>]</li> <li>• Met: UNGC principles 3-6: The Company is a signatory of the UNGC. [UN Global Compact, N/A: <a href="http://csr.ferragamo.com">csr.ferragamo.com</a>]</li> <li>• Not met: Explicitly list ALL four ILO for AP suppliers: The Company states that 'The recipients are required to respect human rights, including the rights of the workers, within their activities and operations, recognizing without any distinction freedom and equality in dignity and the rights of human beings, as enshrined in the International Bill of Rights and in the fundamental Conventions of the International Labour Organization (ILO)' and states that 'The recipients are required to condemn and abstain themselves from engaging in any form of child labour [...]. The recipients are required to condemn and refrain from engaging in any form and type of forced and compulsory labour and exploitation [...]. The recipients must refrain from any form of discrimination towards their employees and collaborators [...]. The recipients are required to guarantee the right of workers to form trade unions and to bargain collectively, without distinction or discrimination and without fear of repercussions, in accordance with applicable laws and regulations'. However, it is not clear whether the Company is requiring to respecting those rights in all contexts, as it indicates 'in accordance with applicable laws'. In these cases, companies are expected to require alternative mechanisms or equivalent workers bodies where the right to freedom of association and collective bargaining is restricted under law. [Supplier Code of Conduct, 13/12/2018: <a href="http://csr.ferragamo.com">csr.ferragamo.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Explicit commitment to All four ILO Core: See above [SA8000 Policy, 24/04/2019: <a href="http://group.ferragamo.com">group.ferragamo.com</a>]</li> <li>• Met: Respect H&amp;S of workers: It is stated in the Sustainability Report, that 'Over the years, the Company has made significant investments in safeguarding the wellbeing of its employees, developing an Occupational Health and Safety</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Management System to reduce or minimize the risks employees or other parties may be exposed to for different reasons as part of the Company's operations'. [Sustainability report 2018, 27/03/2019: <a href="http://csr.ferragamo.com">csr.ferragamo.com</a> &amp; Code of Ethics, 15/12/2016: <a href="http://group.ferragamo.com">group.ferragamo.com</a>]</p> <ul style="list-style-type: none"> <li>• Met: H&amp;S applies to AP suppliers: The Code of ethics, which applies to suppliers, states that 'health and safety in the workplace is a top priority for the Company, which takes action to guarantee its employees and contractors a safe, healthy work environment in compliance with current legislation. The Company promotes a solid awareness of occupational health and safety in the workplace, and has adopted an integrated environmental safety management system that is audited regularly'. [Code of Ethics, 15/12/2016: <a href="http://group.ferragamo.com">group.ferragamo.com</a>]</li> <li>• Not met: working hours for workers: The Company indicates that 'This implies respecting the applicable laws concerning working hours, breaks and public holidays, guaranteeing a living wage and minimum income' in accordance with the SA8000 standards, which requires that a regular work week shall not exceed 48 hours and all overtime work shall not exceed 12 hours per week and shall not be requested in a regular basis. The Company states that 'In 2019 Salvatore Ferragamo has obtained, for all the Italian operations, the SA8000 certification'. However, it is not clear if all operations are SA8000 certified. [SA8000 Policy, 24/04/2019: <a href="http://group.ferragamo.com">group.ferragamo.com</a> &amp; Inspiring and Motivating: <a href="http://csr.ferragamo.com">csr.ferragamo.com</a>]</li> <li>• Met: Working hours for AP suppliers: The Company states that 'The recipients are required to ensure full compliance with the regulations and collective labour agreements on working hours and overtime, including breaks, rest days, holidays and leave for any reason. In particular, the recipients are required to guarantee to their employees a maximum of working and overtime hours, in alignment with the provisions of the ILO Conventions' [Supplier Code of Conduct, 13/12/2018: <a href="http://csr.ferragamo.com">csr.ferragamo.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 that 'is committed to ensuring that communications with stakeholders are based on collaboration, fairness and transparency, and incentivizing constant dialogue in order to raise awareness of social and environmental responsibility in the corporate environment'. And describes its stakeholders: 'The following have been identified as internal stakeholders: employees, shareholders, investors, distributors, suppliers and contract manufacturers. The following have been identified as external stakeholders: final customers, schools and universities, regulatory and governmental bodies and the public administration, local communities, non-governmental organizations (NGOs), media and influencers, and trade associations'. [Sustainability Report 2019, 2020: <a href="http://csr.ferragamo.com">csr.ferragamo.com</a> &amp; Sustainability Policy, 2017: <a href="http://csr.ferragamo.com">csr.ferragamo.com</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</li> </ul>
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</li> </ul> <p>Score 2</p> <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	<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 signatory to the UN Global Compact.</li> <li>• Not met: Senior responsibility for HR</li> </ul> <p>Score 2</p> <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>

Indicator Code	Indicator name	Score (out of 2)	Explanation
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"> <li>• Not met: Identifying risks in own operations: Salvatore Ferragamo Group's adopts an Enterprise Risk Management (ERM) model designed to support top management in identifying the main business risks and the ways in which they are managed. No description found about a process to identify its potential human rights risks and impacts covering its own operations. [Sustainability Report 2019, 2020: <a href="http://csr.ferragamo.com">csr.ferragamo.com</a>]</li> <li>• Not met: Identifying risks in AP suppliers</li> </ul> <p>Score 2</p> <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	<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: Salient risk assessment (and context): The Company indicates in the 2019 report that 'macro-categories of risk and the main impacts in terms of sustainability: market and strategic risk, operating risks connected to typical processes, financial risk, internal and external compliance risks connected to the failure to comply with laws and regulations [...] health, safety and quality of workers' professional life and the value chain'. Also, in its 2019 Modern Slavery Statement it discloses that 'As regards social aspects and respect of human rights, the Group monitors risks connected to the violation of labour laws, as well as inadequate procurement and supply chain model. The Group believes that the risk of modern slavery within its organization is almost non-existent and that it is generally low in its production supply chain. The geographical location and the nature of the carefully selected and qualified suppliers, often dedicated and continuous collaborators of the Group for many years, reduces the risks of forced labor and trafficking in human beings'. However, no description found of the due diligence process for assessing its human rights risks and what it considers to be its salient human rights issues. It seems to refer to supplier selection. [Sustainability Report 2019, 2020: <a href="http://csr.ferragamo.com">csr.ferragamo.com</a> &amp; Modern Slavery Statement 2019, 10/03/2020: <a href="http://group.ferragamo.com">group.ferragamo.com</a>]</li> <li>• Not met: Public disclosure of salient risks</li> </ul> <p>Score 2</p> <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	<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: Action Plans to mitigate risks</li> <li>• Not met: Including in AP supply chain</li> <li>• Not met: Example of Actions decided</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
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"> <li>Not met: System to check if Actions are effective: Salvatore Ferragamo discloses that 'constantly monitors the effectiveness of actions and measures in place for an ethical and responsible business conduct, including measures taken to mitigate modern slavery risks. In particular, the Group has defined internal KPIs to monitor how the business is exposed to the risk of modern slavery (whistleblowing reports) and to measure the performance of anti-slavery actions undertaken (results of audits conducted on suppliers and number of training activity performed)'. Also, the Company describes that 'is setting up a specific audit plan for contract manufacturers and suppliers, who are initially asked to fill in a self-assessment questionnaire. This audit activity accompanies the monitoring of sub-suppliers which the Group has been doing since 2014, in order to assess compliance with ethical and social standards. The audits on the second level of the supply chain are organized according to a multi-year plan and managed by a specialized external company, in order to verify respect for human and workers' rights, as well as compliance with occupational health, safety and hygiene regulatory standards'. However, the system seems to refer only to modern slavery, it does not mention other human rights issues. Also, audits seem to refer to compliance monitoring of individual suppliers. This indicator looks for a description of a system for tracking actions taken in response to human rights risks and impacts assessed and for evaluating whether risk-based approach actions have been effective. [Modern Slavery Statement 2019, 10/03/2020: <a href="http://group.ferragamo.com">group.ferragamo.com</a> &amp; Sustainability Report 2019, 2020: <a href="http://csr.ferragamo.com">csr.ferragamo.com</a>]</li> <li>Not met: Lessons learnt from checking effectiveness: The Company discloses that 'based on the audit findings, the Group prepares an improvement plan with the subcontractor to prevent, mitigate, or remedy any non-compliance. The plan requires implementing specific actions within given deadlines agreed upon by the parties, as well as clearly identifying a person responsible at the supplier'. However, no further details or examples about lessons learnt from checking effectiveness of its system to check if Actions are effective were found. [Sustainability Report 2019, 2020: <a href="http://csr.ferragamo.com">csr.ferragamo.com</a>]</li> </ul> <p>Score 2</p> <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	<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: 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: In order to be awarded this indicator, the Company has to achieve a full score in B.2.2</li> <li>Not met: Comms plan re action plans for risks</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</li> </ul> <p>Score 2</p> <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: There is a whistleblowing system which covers the entire group. Any failure to comply with the Ethics Code or other internal issue can be reported. [Sustainability report 2018, 27/03/2019: <a href="http://csr.ferragamo.com">csr.ferragamo.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>Met: Number grievances filed, addressed or resolved: In the Sustainability Report the company states that 'In 2016 and 2017, there were no grievances about human rights.' [Sustainability report 2017, 23/03/2018: <a href="http://csr.ferragamo.com">csr.ferragamo.com</a>]</li> <li>Not met: Channel is available in all appropriate languages: The channel is available in 9 different languages. However, it is not clear if these 9 languages covers all languages in which the Company operates, since, accordingly its website, the Ferragamo Group is present in over 90 countries. [Integrity Platform: <a href="http://salvatore-ferragamo.integrityplatform.org">salvatore-ferragamo.integrityplatform.org</a> &amp; Group Overview, 2020: <a href="http://group.ferragamo.com">group.ferragamo.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Not met: Expect AP supplier to have equivalent grievance systems</li> <li>• Met: Opens own system to AP supplier workers: The Company discloses in its Supplier Code of Conduct that 'encourages the informed use of open communication channels for the receipt of any requests of information and for the reporting in good faith of alleged or proven violations of the provisions of the Code. For the request of information related to the Code, including its interpretation and application, it is possible to contact the Group's contact persons directly involved in the management of the current commercial relations. For any report concerning an alleged and/or proven violation of the Code, it is possible to contact the Group Ethics Committee using the following addresses [...] The Group commits treat each report received with confidentiality, privacy and without any form of retaliation'. It provides both email and postal address. [Supplier Code of Conduct, 13/12/2018: <a href="http://csr.ferragamo.com">csr.ferragamo.com</a>]</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: The Company states that 'The Group encourages the informed use of open communication channels for the receipt of any requests of information and for the reporting in good faith of alleged or proven violations of the provisions of the Code. For the request of information related to the Code, including its interpretation and application, it is possible to contact the Group's contact persons directly involved in the management of the current commercial relations. For any report concerning an alleged and/or proven violation of the Code, it is possible to contact the Group Ethics Committee using the following addresses: <a href="mailto:ethics-committee@ferragamo.com">ethics-committee@ferragamo.com</a>; Comitato Etico c/o Salvatore Ferragamo S.p.A. Via Mercalli 205/207, 50019 Sesto Fiorentino, FI.'</li> </ul> <p>However, no evidence disclosing if the grievance mechanism is available for communities was found. [Supplier Code of Conduct, 13/12/2018: <a href="http://csr.ferragamo.com">csr.ferragamo.com</a>]</p> <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: The Company states that 'The Group also encourages the adoption of measures aimed at guaranteeing the adequate receipt of reports regarding any non-compliance'. However, no evidence of a requirement regarding the establishment of a grievance mechanism for supplier's external stakeholders was found. [Supplier Code of Conduct, 13/12/2018: <a href="http://csr.ferragamo.com">csr.ferragamo.com</a>]</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</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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