

Company Name Samsung Electronics
Industry ICT (Own operations and Supply Chain)
UNGP Core Score (*) 14.0 out of 26

Score	Out of	For indicators
Governance and Policy Commitments		
2	2	A.1.1 Commitment to respect human rights
0.5	2	A.1.2 Commitment to respect the human rights of workers
1	2	A.1.4 Commitment to engage with stakeholders
0	2	A.1.5 Commitment to remedy
Embedding respect and Human Rights Due Diligence		
Embedding respect		
1.5	2	B.1.1 Embedding - Responsibility and resources for day-to-day human rights functions
Human Rights Due Diligence (HRDD)		
1.5	2	B.2.1 HRDD - Identifying: Processes and triggers for identifying human rights risks and impacts
1	2	B.2.2 HRDD - Assessing: Assessment of risks and impacts identified (salient risks and key industry risks)
1	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
Remedies and Grievance Mechanisms		
2	2	C.1 Grievance channels/mechanisms to receive complaints or concerns from workers
1.5	2	C.2 Grievance channels/mechanisms to receive complaints or concerns from external individuals and communities
1.5	2	C.7 Remedying adverse impacts and incorporating lessons learned
14.0	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	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Met: General HRs commitment: In its Business Conduct Guidelines, the Company states: 'Samsung respects and protects the fundamental human rights taking into account international human rights principles and standards set forth in the Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights, the Organization for Economic Co-operation and Development's guidelines for multinational enterprises, the UN Convention on the Rights of the Child, the ILO Declaration on Fundamental Principles and Rights at Work, and the laws of the countries in which we operate.' [Business Conduct Guidelines 2016, 2016: samsung.com] <p>Score 2</p> <ul style="list-style-type: none"> Met: UNGPs: The Company indicates, in its 2020 Sustainability Report: 'We have established a robust set of labor and human rights policies based on: (...) the United Nations Guiding Principles on Business and Human Rights (UNGPs)' among other international principles and conventions. Moreover, the Company explains that its approach to Labor and Human Rights Policies and Education is 'Compliance with international human rights guidelines such as UN Guiding Principles on Business and Human Rights and RBA Code of Conduct as well as local laws and regulations'. In its Child Labor Prohibition Policy, it states: 'Samsung endeavors to comply with all applicable local laws and regulations, and respects the spirit and intention of the international norms and standards such as the United Nations Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights'. However, 'based on', 'compliance with' and 'endeavors to comply' are not considered a formal commitment following CHRB wording criteria. Finally, in its Migrant Worker Policy, it explains: 'Samsung is committed to respect the fundamental human rights of workers including international human rights principles and standards set forth in (...) the UN Guiding Principles on Business and Human Rights'. [2020 Sustainability Report, 06/05/2020: images.samsung.com & Child Labor Prohibition Policy_V_2.0, 06/2020: images.samsung.com]
A.1.2	Commitment to respect the human rights of workers	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Met: ILO Core: The Company indicates, in its Child Labor Prohibition Policy: 'Samsung endeavors to comply with all applicable local laws and regulations, and respects the spirit and intention of the international norms and standards such as (...) the ILO Declaration on Fundamental Principles and Rights at Work'. In its Migrant Worker Policy, it states: 'Samsung is committed to respect the fundamental human rights of workers including international human rights principles and standards set forth in (...) the ILO Declaration on Fundamental Principles and Rights at Work (...)'. [Child Labor Prohibition Policy_V_2.0, 06/2020: images.samsung.com & Migrant Worker Policy V 2.0, 06/2020: samsung.com] Not met: UNGC principles 3-6 Not met: Explicitly list ALL four ILO for ICT suppliers: Its Supplier Code of Conduct includes the following provisions: 'Forced, bonded (including debt bondage) or indentured labor, involuntary prison labor, slavery or trafficking of persons shall not be used.'; 'Child labor must not be used in any stage of manufacturing.'; 'Companies shall not engage in discrimination based on race, color, age, gender, [...] or marital status in hiring and employment practices such as wages, promotions, rewards, and access to training.'; 'In conformance with local law, Suppliers shall respect the right of all workers to form and join worker council or trade unions of their own choosing, to bargain collectively and to engage in peaceful assembly as well as respect the right of workers to refrain from such activities. Workers and/or their representatives shall be able to openly communicate and share ideas and concerns with management regarding working

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>conditions and management practices without fear of discrimination, reprisal, intimidation or harassment'. Moreover, 'The Code is based on the RBA Code of Conduct. The global standards and guidelines established by organizations such as ILO and ISO may be used as the reference for the Code'. However, it is not clear whether the Company is requiring to respecting freedom of association and collective bargaining rights in all contexts, as it indicates 'in conformance with local law'. [Supplier Code of Conduct, 01/2018: samsung.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Explicit commitment to All four ILO Core: The Company indicates, in its document 'Business Principles' that 'We respect the basic human rights of everyone. We do not, under any circumstances, permit forced labor, wage exploitation or child labor. We do not discriminate against any stakeholders, including customers and employees'. The Company also has a Child Labor Prohibition Policy and a Migrant Worker Policy. In addition, in its Business conduct guidelines 2016, it states: 'we recognize and respect our employees' right to freedom of association in accordance with local laws'. Furthermore, according to its Code of Conduct: 'The Company respect the rights to freedom of association and collective bargaining in accordance with the local labor laws where our worksites operate in order to maintain and develop our cooperative labor-management relations based on mutual trust and integrity'. It is not clear whether it is committed to respect these rights in all contexts and locations (i.e alternative mechanisms for those countries where there are legal restrictions to the exercise of these rights), as the Company indicates that it respects these rights 'in conformance with local laws'. Moreover, in its 2020 Sustainability Report, it explains: 'Samsung Electronics respects the freedom and fundamental rights entitled to all people. We ensure equal opportunities for all employees and job applicants, and do not tolerate discrimination of any kind. We also respect the freedom of association of all our employees'. However, as indicated, companies formal policies seem to commit to respect freedom of association and collective bargaining in the context of local laws. [Business Principles, N/A: sec-audit.com & Business Conduct Guidelines 2016, 2016: samsung.com] • Met: Respect H&S of workers: In addition, the Company indicates that its 'highest priority is to ensure the health and safety of our employees and communities. We strive to provide a safe working environment for all Samsung employees.' [Business Conduct Guidelines 2016, 2016: samsung.com] • Met: H&S applies to ICT suppliers: Its Supplier Code include a section with respect Health and Safety, which says: 'Suppliers shall ensure to maintain safe and healthy working conditions according to the local laws and regulations.' The Code include provisions related to: Occupational Safety, Emergency Preparedness, Occupational Injury and Illness, Industrial Hygiene, Food, Sanitation and Housing among others. [Supplier Code of Conduct, 01/2018: samsung.com] • Not met: working hours for workers: According to its Business Conduct Guidelines 'Working hours are decided according to the characteristics of each work area and the related regulations in each country'. Moreover, as it is stated in its 2020 Sustainability Report: 'A workweek should not be more than 60 hours per week (RBA criteria, ILO conventions on working hours)'. Finally, in its Code of Conduct it indicates: 'The Company will ensure that working hours of personnel will be in accordance with the specific nature of their duties and comply with national, state and local laws. However, no evidence found of references to standard weekly hours or the Company explicitly committing to respect ILO conventions on working hours. [Business Conduct Guidelines 2016, 2016: samsung.com & 2020 Responsible Mineral Report, 06/2020: images.samsung.com] • Not met: Working hours for ICT suppliers: With respect 'Working hours', its Supplier Code indicates: 'Working hours are not to exceed the maximum set by local law. Further, a workweek should not be more than 60 hours per week, including overtime, except in emergency or unusual situations. Workers shall be allowed at least one day off every seven days'. However, no details found regarding requirements for suppliers to commit to a maximum of 48 hours for standard weekly hours or to respect international standards on working hours [Supplier Code of Conduct, 01/2018: samsung.com]
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"> • Met: Regular stakeholder engagement: In its Sustainability Report 2019, the Company discloses information about its Stakeholder Engagement and Communication activities, which shows evidence of regularly engagement with several stakeholder groups including local communities, employers and suppliers. According to the 2020 Sustainability Report: 'Communication and engagement with various stakeholders is essential for us to fulfill our duties as a responsible global

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>corporate citizen. We strive to build a cooperative relationship and enhance mutual understanding in sustainability topics with our stakeholders through various activities such as stakeholder forums, surveys, and on-site visits'. [2019 Sustainability Report, 2019: images.samsung.com & 2020 Responsible Mineral Report, 06/2020: images.samsung.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Commits to engage stakeholders in design • Not met: Regular stakeholder design engagement: Also, 'to identify labor and human rights risk factors that could impact our worksites around the world, it is also important to engage with our external stakeholders. To do this, we engage in regular dialogue with governments, academia and civil society. In 2018, we hired international experts in human rights to identify key issues in labor rights while listening to independent specialists' advice, which further strengthened our stakeholder communication'. 'As for newly identified responsible minerals, we work jointly with our global stakeholders by participating in councils, such as the Responsible Minerals Initiative (RMI) and the European Partnership for Responsible Minerals (EPRM)'. Also, 'In 2019, we communicated with ESG evaluation agencies, environmental research institutes, NGOs, impact investors and sustainability experts to introduce our approach to sustainability management issues, key activities and progress, and gather feedback from stakeholders. The opinions we gathered were reflected in the materiality assessment and will be considered when planning our sustainable management activities'. However, no details found on engagement with affected stakeholders in the development or monitoring of the human rights approach. [2020 Responsible Mineral Report, 06/2020: images.samsung.com]
A.1.5	Commitment to remedy	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Commits to remedy: In its 2020 Sustainability Report, it states: 'The protection, respect and remedy of human rights are essential to the sustainable development of a global society'. Moreover, according to its Child Labor Prohibition Policy: 'Samsung shall have effective remediation procedures in place in the event of finding a child laborer at Samsung's worksites'. Also, in its Migrant Worker Policy it indicates: 'If Samsung finds that recruitment agencies are not in compliance with the Policy, Samsung and the recruitment agencies will seek to take immediate steps to ensure compliance with the Policy in accordance with applicable laws, and regulations'. The Company indicates that as part of its Grievance Resolution Procedure: 'Grievance is resolved through measures such as training, disciplinary action against the accused, providing useful information or support, and improving infrastructures, related policies and procedures'. Finally, in the BHRRC, it is found that 'A report from The Guardian reveals recruitment fees charged to migrant workers, and the withholding of workers' passports, at Samsung's suppliers in Malaysia. Workers are reportedly afraid to speak out about their working conditions, for fear of violence. Samsung has published a response to the allegation, in which it reports that it is conducting an investigation into the information published by The Guardian, and that it will put in place the necessary remedies should its investigation reveal similar allegations'. However, this indicator looks for a general statement committing to remedy the adverse impacts on individuals, workers and communities that it has caused or contributed to. Current evidence seems to refer to specific cases of non-compliance. [2020 Sustainability Report, 06/05/2020: images.samsung.com & Child Labor Prohibition Policy_V_2.0, 06/2020: images.samsung.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: According to 2020 Sustainability Report: 'From 2018 to 2019 in Vietnam, we conducted the Human Rights Impact Assessment (HRIA) based on the three principles of UNGPs: Protection, Respect, and Remedy. For an objective review, we identified potential labor and human rights risks with expert support of BSR through employee interviews, document reviews and stakeholders engagement. While we did not detect any human rights violations in need of immediate action, we established remediation and mitigation measures for areas where further progress could be made, using recommendations from BSR'. In its Child Labor Prohibition Policy, it indicates: 'Samsung will, taking into account the best interest of the child, work with the child, and his/her family or caregiver, or a third party child rights organization to find an appropriate remedial solution in accordance with Samsung's remediation procedure'. The Company has provided comments to CHRB regarding this indicator; however, its content has not been found in publicly available sources. No public evidence found of collaboration with entities/initiatives that

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			<p>provide access to remedy. No further evidence found. [2020 Responsible Mineral Report, 06/2020: images.samsung.com & Child Labor Prohibition Policy_V_2.0, 06/2020: images.samsung.com]</p> <ul style="list-style-type: none"> • Not met: Work with ICT suppliers to remedy impacts: According to its Migrant Worker Policy it indicates: 'If Samsung finds that suppliers are not in compliance with the Policy, Samsung and the supplier will seek to take immediate steps to ensure compliance with the Policy in accordance with applicable laws, and regulations'. However, no details found on how it actually commits or works with suppliers to remedy adverse impacts either through the business relationship's own mechanisms or through the development of third party non-judicial remedies. [Migrant Worker Policy V 2.0, 06/2020: samsung.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	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Commits to ILO core conventions: See indicator A.1.2. The Company is committed to respect the ILO Declaration. • Met: Senior responsibility for HR: The 2018 Modern Slavery Statement explains: 'In 2018, Samsung appointed a Global Director for Labour and Human Rights. This new role was created to strengthen the company's relationships with key international policymakers and opinion formers, and to support Human Resources and other business departments in driving corporate and supply chain improvements'. According to the 2020 Sustainability Report: 'Our Global Labor Issues (GLI) Committee manages the impacts and risks on labor and human rights. The GLI Committee, which convenes bi-weekly to discuss labor and human rights issues, consists of executives and working-level employees from five functions (Human Resources Team, Legal Office, Partner Collaboration Center, Global Public Affairs Team, Global EHS Center). Any important matters are escalated to the Sustainability Council, which consists of key executives, and then reported to top management'. [2018 Modern Slavery Act Statement, 06/2019: images.samsung.com & 2020 Sustainability Report, 06/05/2020: images.samsung.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Day-to-day responsibility: See above. Also, According to a figure presented by the Company, Human Resources Team is responsible for Compliance with labor standards and posting of HR regulations; Corporate Compliance Team is responsible for Strategic resources and management of conflict minerals use; and Global EHS Center is responsible for Environment & Safety of workplaces and products. It also presents a figure where it sets out the responsible unit for compliance and privacy across the organization, including the responsible Units for: Compliance with labor standards; Environment & Safety of workplaces and products; Strategic resources, management of conflict minerals use. Moreover, according to the 2020 Sustainability Report: 'Aside from our internal risk management organizations, we operate the Corporate Social Responsibility (CSR) Risk Management Council to strengthen the Board's supervision on non-financial risks that have vast impacts on our business. Independent Directors and our related departments participate in the CSR Risk Management Council under the Governance Committee and examine related agendas, supervise the internal management system, and explore Ways to solve issues through quarterly discussions. [2019 Sustainability Report, 2019: images.samsung.com & 2020 Sustainability Report, 06/05/2020: images.samsung.com] • Not met: Day-to-day responsibility for ICT in supply chain: See above. In addition, in its 2019 Sustainability Report, the Company states that 'In order to resolve and remediate key issues in the areas of labor relations and human rights (e.g., involving child labor, migrant workers, conflict minerals, privacy, and personal data), we manage risks and develop improvement measures throughout the supply chain with all the related teams in charge'. Moreover, according to the 2020 Sustainability Report: 'Our worksite monitoring system supports the enforcement of labor and human rights and compliance management in areas such as (...) management of suppliers'. However, no further details found about related teams in charge. [2019 Sustainability Report, 2019: images.samsung.com & 2020 Sustainability Report, 06/05/2020: images.samsung.com]

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"> • Met: Identifying risks in own operations: In its Sustainability Report 2019, the Company states: 'We seek to continuously identify, assess and manage actual and potential human rights impacts with which we may be involved either through our own activities or as a result of our business relationships. [...] We have developed a risk analysis system in order to identify the wide range of factors that could potentially lead to adverse human rights impacts at our worksites.' The system includes the following actions: 'Monthly assessments on compliance management and improvement; Assessments on 55 items in 7 areas in 12 languages including, Chinese, Vietnamese, Spanish; Quarterly external/internal risk assessments; Analyze 57 indicators (32 internal management indicators including work environment, labor conditions, human resources operations and 25 external environmental indicators in countries where we operate); Operate in-house grievance-handling channels; Host regular discussions and interviews participating executives, managers, employee representative bodies; Engage with governments, NGOs, and academia to identify diverse risk factors and issues at global worksites.' In the 2020 Sustainability Report, the Company indicates that 'We operate a system that identifies and monitors factors that can affect employees' labor and human rights through a range of internal and external channels'. [Sustainability Report 2018: samsung.com & 2020 Sustainability Report, 06/05/2020: images.samsung.com] • Met: Identifying risks in ICT suppliers: As indicated above, process includes identification and impacts 'with which we may be involved either through our own activities or as a result of our business relationships'. No further evidence found in the 2020 Sustainability Report. [Sustainability Report 2018: samsung.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Ongoing global risk identification: See above. [Sustainability Report 2018: samsung.com] • Met: In consultation with stakeholders: According to the 2020 Sustainability Report, 'We listen to our employees and understand their needs and concerns about labor and human rights through a variety of communication channels'. Also, 'To identify labor and human rights risk factors that could impact our worksites around the world, it is also important to engage with our external stakeholders. To do this, we engage in regular dialogue with governments, academia and civil society'. Finally, as indicate above, the system to identify factors that could lead to adverse human rights impacts include hosting 'regular discussions and interviews participating executives, managers, employee representative bodies'. [2020 Sustainability Report, 06/05/2020: images.samsung.com] • Met: In consultation with HR experts: It indicates: 'In 2018, we hired international experts in human rights to identify key issues in labor rights while listening to independent specialists' advice, which further strengthened our stakeholder communication'. The Company reports working with BSR in carrying out human rights impact assessment. Also, as indicated above, the Company, as part of risk identification, engages with 'governments, NGOs, and academia to identify diverse risk factors and issues at global worksites'. [2020 Sustainability Report, 06/05/2020: images.samsung.com] • Not met: Triggered by new circumstances
B.2.2	Assessing: Assessment of risks and impacts identified (salient risks and key industry risks)	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: Salient risk assessment (and context): In its Sustainability Report 2018, the Company states: 'We seek to continuously identify, assess and manage actual and potential human rights impacts with which we may be involved either through our own activities or as a result of our business relationships.' The system to identify and asses human rights risks includes the following actions: 'Monthly assessments on compliance management and improvement; Assessments on 55 items in 7 areas in 12 languages including, Chinese, Vietnamese, Spanish; Quarterly external/internal risk assessments; Analyze 57 indicators (32 internal management indicators including work environment, labor conditions, human resources operations and 25 external environmental indicators in countries where we operate); Operate in-house grievance-handling channels; Host regular discussions and interviews participating executives, managers, employee representative bodies; Engage with governments, NGOs, and academia to identify diverse risk factors and issues at global worksites.' No new relevant evidence found in last report. [Sustainability Report 2018: samsung.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not met: Public disclosure of salient risks: In its Sustainability Report 2018, the Company states that it 'identified key vulnerable groups to non-exhaustively include children, apprentices, and migrant workers, who are at heightened risk for adverse human rights impacts. Consequently, we have dedicated special care and attention to these particular groups.' However, the information speaks about groups of individuals but not about human rights issues. According to the 2020 Sustainability Report, 'From 2018 to 2019 in Vietnam, we conducted the Human Rights Impact Assessment (HRIA) based on the three principles of UNGPs: Protection, Respect, and Remedy. For an objective review, we identified potential labor and human rights risks with expert support of BSR through employee interviews, document reviews and stakeholders engagement'. The Company also indicates it has multistakeholder forums in Vietnam where women's rights and women's empowerment is discussed. Moreover, in its response document to the Guardian's allegations: 'Samsung Electronics has investigated the allegations in the Guardian article on Malaysia. (...) We have identified issues relating to the employment of migrant workers. Corrective Action Plans have been implemented (...) The Samsung Electronics Malaysia (SEMA) plant in Selangor produces microwave ovens for the global market (...) In November 2018, following the publication of the allegations in the Guardian (...) we promptly conducted additional on-site audits of all 6 sub-contracting suppliers to the SEMA plant'. According to its Child Labor Prohibition Policy, 'Samsung also understands that 'young workers' (as defined below) may be more vulnerable to harm and injury due to their young age'. Finally, as it is stated in the Migrant Worker Policy, 'Samsung strongly supports the right of voluntary work and is committed to banning participation in, or imposition of, forced labor, bonded (including debt bondage) or indentured labor, involuntary or exploitive prison labor, slavery or trafficking of persons'. Although the Company, gives examples of human rights issues identified through HRIAs in a specific location, or through investigations following public allegations, or because of industry associated risks, it is not clear the results of its risk assessments which may be aggregated across its operations and locations. [Sustainability Report 2018: samsung.com & 2020 Sustainability Report, 06/05/2020: images.samsung.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met
B.2.3	Integrating and Acting: Integrating assessment findings internally and taking appropriate action	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"> • Not met: Action Plans to mitigate risks • Not met: Including in ICT supply chain • Met: Example of Actions decided: The Company states in its Sustainability Report 2019: 'Migrant workers are often vulnerable to the risk of forced, bonded, or indentured labor as well as human trafficking as they are seeking economic opportunities outside their own country due to unstable political or economic situation in their home countries. In 2018, we conducted an investigation of all our first-tier suppliers located in Malaysia. We took an especially closer look at recruitment fees and identification documents. After the inspections, we provided education for the entire suppliers' management and working groups to avoid recurrence of similar issues and to protect migrant workers'. Moreover, according to the 2020 Sustainability Report: 'From 2018 to 2019 in Vietnam, we conducted the Human Rights Impact Assessment (HRIA) based on the three principles of UNGPs: Protection, Respect, and Remedy. (...) While we did not detect any human rights violations in need of immediate action, we established remediation and mitigation measures for areas where further progress could be made, using recommendations from BSR'. The Company has provided more comments to CHRB regarding its grievance mechanism procedure and trainings as a result of grievances raised. However, evidence was not material for this indicator. [2019 Sustainability Report, 2019: images.samsung.com & 2020 Responsible Mineral Report, 06/2020: images.samsung.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met
B.2.4	Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: System to check if Actions are effective

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not met: Lessons learnt from checking effectiveness: The Company indicates that ‘From 2018 to 2019 in Vietnam, we conducted the Human Rights Impact Assessment (HRIA) based on the three principles of UNGPs: Protection, Respect, and Remedy. (...) As part of our continuous improvement efforts, we share our findings, recommendations, and multiyear action plan with the stakeholders involved and interested in our HRIA’. Moreover, ‘A total of 11,828 grievances were reported in 2019, out of which all grievants were addressed within our grievance handling timeline. Details of the resolution were also provided. The number of grievances has declined over the past three years. In particular, the number of grievances regarding working environment decreased by 1,462 (33%) from 4,403 in 2017 to 2,941 in 2019. As part of our efforts to provide a better working environment in 2019, we established of a healthcare center in Vietnam, installed reflectors for worksite safety in Brazil, expanded resting spaces and remodeled restrooms in Slovakia, and upgraded the company’s cafeteria in Russia. In addition, grievances relating to workers right have resulted in improvements of policies, internal processes and increased capacity building efforts throughout the entire organization’. Finally, ‘Since 2018, we have hosted multistakeholder forums in Vietnam. In 2019, we discussed women’s rights and women’s empowerment in the Vietnam (...). The forum opened up a discussion on corporate policies, practices and implications on preventing sexual harassment, women leadership, and women’s empowerment’. However, no example found of the lessons learned while tracking the effectiveness of its actions on at least one of its salient human rights issues as a result of the due diligence process. The Company has provided comments to CHRB regarding its grievance procedure. However, evidence was not material for this indicator. [2019 Sustainability Report, 2019: images.samsung.com & 2020 Sustainability Report, 06/05/2020: images.samsung.com] <p>Score 2</p> <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	0.5	<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: 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. • 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. Although the Company describes a system to assess human rights risks and impacts, no specific evidence found on a description on which are its salient issues. • 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 ICT suppliers: The case of recruitment fees charged to migrant workers in Malaysia in Samsung’s supply chain was made public to BHRRS. The Company also discloses different types of grievances reported in the last three reporting years within its supply chain. However, 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 [Follow-up response: Malasia, 12/03/2019: business-humanrights.org & 2020 Sustainability Report, 06/05/2020: images.samsung.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Responding to affected stakeholders concerns: The Company discloses different types of grievances reported in the las three reporting years and it indicates different types of grievance mechanisms. However, it is not clear how it has responded, in terms of communication, to specific human rights concerns raised by, or on behalf of, affected stakeholders. [2020 Sustainability Report, 06/05/2020: images.samsung.com] • Not met: Ensuring affected stakeholders can access communications: The Company indicates: ‘From 2018 to 2019 in Vietnam, we conducted the Human Rights Impact Assessment (HRIA) based on the three principles of UNGPs: Protection, Respect, and Remedy. (...) As part of our continuous improvement efforts, we share our findings, recommendations, and multiyear action plan with the stakeholders involved and interested in our HRIA’. However, it is not clear how it ensures that the affected or potentially affected stakeholders and their legitimate representatives are able to access these communications (also needs to be in the context of concerns raised by them). [2020 Sustainability Report, 06/05/2020: images.samsung.com]

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	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Channel accessible to all workers: In its Business Conduct Guidelines, the Company states that it 'has dedicated channels through which our employees can report violations of 'Business Conduct Guidelines'. Employees may call, send a fax or submit an online report on the Ethical Management website. The website is accessible in 14 languages across 67 different websites, and reports are handled discreetly.' [Business Conduct Guidelines 2016, 2016: samsung.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Number grievances filed, addressed or resolved: The Company indicates, in its 2020 Sustainability Report, that 'A total of 11,828 grievances were reported in 2019, out of which all grievants were addressed within our grievance handling timeline'. Types of grievance were: work conditions (4,015); health and safety, (1,350); harassment (68); discrimination (17), among others. [2020 Sustainability Report, 06/05/2020: images.samsung.com] • Met: Channel is available in all appropriate languages: See above. [Business Conduct Guidelines 2016, 2016: samsung.com] • Met: Expect ICT supplier to have equivalent grievance systems: In its Supplier Code of Conduct, the Company indicates: 'The Supplier shall establish and continue to operate at all times processes, including an effective grievance mechanism to assess employees' understanding of and obtain feedback on violations against practices and conditions covered by this Code and to foster continuous improvement.' In addition, the Company indicates in its Supplier Code of Conduct that 'All Suppliers shall adhere to the Code and ensure all of their direct or indirect sub-suppliers related to assembly, components, raw materials and packaging comply with the Code.' [Supplier Code of Conduct, 01/2018: samsung.com] • Met: Opens own system to ICT supplier workers: The Company indicates, in its 2020 Sustainability Report, 'To facilitate communication between the management team and employees at suppliers, we support our suppliers to establish and operate their own grievance handling channels. In addition, we operate a hotline to receive reports on suppliers' violations of the work environment standards or human rights, and address them by conducting on-site audits. Reports are submitted via landline, email, or mobile phone, and posters introducing the hotline system in local languages are displayed in places including offices, hallways, manufacturing sites, dormitories, and cafeterias'. [2020 Sustainability Report, 06/05/2020: images.samsung.com]
C.2	Grievance channel(s)/mechanism(s) to receive complaints or concerns from external individuals and communities	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: Grievance mechanism for community: According to its 2020 Sustainability Report: 'Anyone can raise their concerns, free from any discrimination and retributions, and can expect the procedure to be fully transparent and protect the human rights of the involved throughout the entire process'. Furthermore, 'Based on our Grievance Resolution Guidelines, we operate four types of grievance resolution channels hotline, online, offline channels, and Works Councils. The channels are provided in the various languages. In addition, worksites employing migrant workers provide information on grievance resolution channels in their native languages to enhance employee accessibility and grievance channel effectiveness. Furthermore, we operate Samsung Electronics' Global Business Ethics & Compliance system, corporate hotline, and email account to listen to the opinions of various external stakeholders'. [2020 Sustainability Report, 06/05/2020: images.samsung.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Describes accessibility and local languages: The Company indicates: 'worksites employing migrant workers provide information on grievance resolution channels in their native languages to enhance employee accessibility and grievance channel effectiveness'. Moreover, 'Reports are submitted via landline, email, or mobile phone, and posters introducing the hotline system in local languages are displayed in places including offices, hallways, manufacturing sites, dormitories, and cafeterias'. However, it is not clear these grievance mechanisms are accessible to all potentially affected external stakeholders at all operations, in their local languages, as current evidence focuses on workers. [2020 Sustainability Report, 06/05/2020: images.samsung.com] • Met: ICT supplier communities use global system: As indicated above: 'Anyone can raise their concerns, free from any discrimination and retributions, and can expect the procedure to be fully transparent and protect the human rights of the involved throughout the entire process'. Furthermore, 'we operate Samsung

Indicator Code	Indicator name	Score (out of 2)	Explanation
			Electronics' Global Business Ethics & Compliance system, corporate hotline, and email account to listen to the opinions of various external stakeholders'. [2020 Sustainability Report, 06/05/2020: images.samsung.com]
C.7	Remedying adverse impacts and incorporating lessons learned	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: Says how it would remedy key sector risks: The Company sets out its Child Labor Remediation Program in its Child Labor Prohibition Policy, which includes, among other actions, the following: 'Make an initial assessment to ensure the safety of the child. The worksite shall terminate its employment relationship with the child and provide him/her a child labor remediation program considering the best interest of the child. Samsung will, taking into account the best interest of the child, work with the child, and his/her family or caregiver, or a third party child rights organization to find an appropriate remedial solution in accordance with Samsung's remediation procedure. This may include the expenses in order to provide a reasonable living considering minimum living costs or minimum wage of the relevant region and/or enrolment in a suitable educational program to enable the child to return to school. Whenever the need for sending the child back home arises, Samsung shall reimburse necessary costs of transportation incurred by the child and his/her family to return to his/her original place of residence. In case the family may not be able to accompany the child, Samsung shall provide a suitable alternative to ensure the safe return of the child back home. When a remediation program that serves the best interest of the child is available and the child and his/her family agree to such remediation program, Samsung shall provide adequate financial support to enable the child to remain in the agreed remediation program until he/she reaches the minimum working age. When the child reaches the minimum working age, he/she shall be given the opportunity to be re-employed by the same worksite of Samsung'. Moreover, the Company has provided comments to CHRB regarding Vietnam, in its 2020 Sustainability Report: 'we conducted the Human Rights Impact Assessment'. However, evidence was in response to risks identified rather than its approach to provide a timely remedy for victims. [Child Labor Prohibition Policy_V_2.0, 06/2020: images.samsung.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Changes introduced to stop repetition: Samsung Electronics has investigated the allegations in the Guardian article on Malaysia. The Company, allegedly, had cases of passport retention and recruitment fees paid by workers in Samsung's supply chain in Malaysia. After an investigation, 'The audit team identified the following key issues: 54% of workers from 3 sub-contractors had their passports held in a safe. Of those, 85% gave their written consent for the employer to hold their passport. 61% of workers from 3 sub-contractors paid recruitment fees'. As a result of the November 2018 audits, corrective action plans were put in place: 'Improvements to date include: As of February 2019, passport retention was 0%. All 6 sub-contractors revised their policies to include prohibition of unlawful deduction of recruitment fees and levies starting January 2019. Meanwhile other issues such as housing conditions and repayment of recruitment fees and levies paid by workers are progressing towards improvement. Two sub-contractors are developing their reimbursement plan'. Moreover, according to its 2020 Sustainability Report, it indicates that 'In Malaysia and Hungary, together with the International Organization for Migration (IOM), we trained our human resource personnel, as well as those from our suppliers and recruitment agencies, on the ethical recruitment of migrant workers. Through this, we were able to raise awareness on protecting the rights of migrant workers and share the importance of eradicating forced labor'. [Follow-up response: Malasia, 12/03/2019: business-humanrights.org & 2020 Sustainability Report, 06/05/2020: images.samsung.com] • Not met: Evaluation of the channel/mechanism: The Company provided information regarding the way a specific grievance case was handled. However, no evidence found of evaluation of the effectiveness of the grievance channel. [2020 Sustainability Report, 06/05/2020: images.samsung.com]

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
E(1).0	Serious allegation No 1		<ul style="list-style-type: none"> • Headline: Samsung facing child labour claims in its supply chain in the Democratic Republic of Congo • Area: Child labour • Story: On November 15, 2017, Amnesty International released a follow-up report regarding human rights abuses entering their cobalt supply chains amongst electronic and electric vehicle companies, including Apple. <p>The report assessed the policies and practices of 29 companies and how much their cobalt-sourcing practices have improved since its previous report published in January 2016. More than half of the world's cobalt, a key element in lithium-ion batteries, is sourced from the Democratic Republic of Congo (DRC), where Amnesty has found human rights abuses. Amnesty International stated that about a fifth of the country's cobalt production is mined by informal miners including children, often in dangerous conditions. The report also claimed that children as young as seven engaged in artisanal cobalt mining. Some of these children worked in the tunnels alongside adult miners, while most helped to pick through mine tailings and wash minerals prior to sale. Many were forced to carry out this hazardous work because their families were too poor to pay school fees. Children are also being subjected to beatings and extortion by security guards and exploited by traders.</p> <p>Amnesty International pointed out that Apple has made significant progress since the 2016 report and it is leading the way in tracing cobalt used in its electronics. Apple now explicitly lists cobalt among the minerals for which it requires supplier due diligence in line with international standards.</p> <p>The electronics companies and the automobile manufacturers included in the report are: Apple, Samsung SDI, Dell, HP, BMW, Tesla, LG Chem, Sony, Samsung Electronics, General Motors, Volkswagen, Fiat-Chrysler, Daimler, Hunan, Shanshan, Amperex Technology, Tianjin Lishen, Microsoft, Lenovo, Renault, Vodafone, Huawei, L&F, Tianjin B&M, BYD, Coslight, Shenzhan BAK and ZTE.</p> <ul style="list-style-type: none"> • Sources: [Amnesty International, 15/11/2017: amnesty.org][Reuters, 15/11/2017: reuters.com]
E(1).1	The Company has responded publicly to the allegation	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Public response available: The Company states that "In 2016, Amnesty International shed light on the issue of children working in cobalt mines in the Democratic Republic of Congo and demanded corporate intervention to address this issue." [Sustainability Report 2017: samsung.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Response goes into detail: The Company's response does not go into details.
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"> • Met: Company policies address the general issues raised: The Company states that "Our policy against child labor is based on the UN Convention on the Rights of the Child, The Children's Rights and Business Principles, and ILO Convention. It requires all of our subsidiaries, as well as all of our suppliers, to comply with the policy". [Business Conduct Guidelines 2016, 2016: samsung.com] • Met: Policies apply to the type of business relationships involved: See above. [Business Conduct Guidelines 2016, 2016: samsung.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Policies address the specific rights in question: The Company states that "all of our subsidiaries and suppliers must comply with the strict employment process and age verification. Our policy against child labor operates under the "zero tolerance" principle, meaning that child labor at any stage of our business is unacceptable and intolerable. Our policy against child labor supports the best interest of children." [Business Conduct Guidelines 2016, 2016: samsung.com]
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"> • Not met: Engages with affected stakeholders: 'For the contribution to sustainable development at cobalt mining in the Democratic Republic of the Congo, we joined hands with Deutsche Gesellschaft für Internationale Zusammenarbeit (GIZ), Samsung SDI, the BMW Group, and BASF to initiate a pilot project called 'Cobalt for Development' in 2019. The project aims to improve the labor conditions of small-scale cobalt mining sectors and the living conditions of

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>surrounding communities. To this end, we are planning to conduct EHS risk assessments, provide trainings for employees, expand the provision of protective equipment for individuals, and offer trainings on financial literacy, farming/agriculture, and education for children.' However, it is unclear how the Company engaged in dialogue with affected stakeholders or their representatives. [2020 Sustainability Report, 06/05/2020: images.samsung.com]</p> <ul style="list-style-type: none"> • Not met: Encourages linked business to engage affected stakeholders: CHRB could not find the evidence of the Company's encouraging its business partners to engage with the affected stakeholders. • Not met: Provides remedies to affected stakeholders: CHRB did not find evidence of the Company providing remedies. • Met: Has reviewed management systems to prevent recurrence: The Company has reviewed the system in 2014. As a result, it has added the facial recognition system to verify workers' age. [Samsung Electronic's response to concerns regarding child labour in Chinese factories, 11/2014: business-humanrights.org] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Remedies are satisfactory to the victims • Not met: Has improved systems and engaged affected stakeholders: The Company has reviewed the system in 2014. As a result, it has added the facial recognition system to verify workers' age. However, CHRB did not find the evidence of the Company's engagement with affected stakeholders. [Samsung Electronic's response to concerns regarding child labour in Chinese factories, 11/2014: business-humanrights.org]
E(2).0	Serious allegation No 2		<ul style="list-style-type: none"> • Headline: Samsung criticised by the UN and the ITUC over working rights and conditions in Vietnam • Area: Working Hours • Story: In March 2018, UN human rights experts have raised concerns about human rights violations at Samsung Vietnam. <p>According to the UN statement, workers at Samsung's Vietnamese plants raised concerns about long hours and unhealthy work conditions at the factories in Vietnam's northern Bac Ninh and Thai Nguyen provinces, near the capital Hanoi. Women workers stated that they have been working 70 to 80 hours per week, responding to the interview conducted by human rights organisations. It is alleged that the workers were threatened and harassed by the Company after raising the concern.</p> <ul style="list-style-type: none"> • Sources: [Financial Times, 21/03/2018: ft.com][ITUC, 21/03/2018: ituc-csi.org][OHCHR, 20/03/2018: ohchr.org][ituc-csi.org, 21/03/2018: goodelectronics.org]
E(2).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"> • Met: Public response available: The Company stated that "We take the concerns of the UN human rights experts very seriously. We have already taken actions to investigate and will co-operate closely with relevant UN bodies and experts to clarify the matter." [Financial Times article on working conditions in Vietnam, 21/03/18: ft.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Response goes into detail: In a letter to the UN Human Rights High Commissioner's office, the Vice President of Global Public Affairs wrote: 'After learning about the allegations in the IPEN report, we immediately compared them with the most recent findings of third-party audits of our factories in Vietnam. We have noticed that many of the allegations raised in the report do not seem to correspond to the overall findings of the audit reports. In order to further verify the allegations and analyze the discrepancies between the allegations and the audit findings, we have established an internal task force to look more closely into and address the concerns expressed in the report. ' [Letter to Office of the High Commissioner for Human Rights on issues in Vietnam, 09/05/2018: spcommreports.ohchr.org]
E(2).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"> • Met: Company policies address the general issues raised: The Company states that "Samsung respects and protects the fundamental human rights taking into account international human rights principles and standards set forth in [...], the ILO Declaration on Fundamental Principles and Rights at Work, and the laws of the countries in which we operate." [Business Conduct Guidelines 2016, 2016: samsung.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Met: Policies apply to the type of business relationships involved: The policy also applies to the Company's business partners. [Samsung Electronics Supplier Code of Conduct, 2017: samsung.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Policies address the specific rights in question: The Company states that "Workweeks are not to exceed the maximum set by local law. Further, a workweek shall not be more than 60 hours per week, including overtime, except in an emergency or unusual situations." [Supplier Code of Conduct, 01/2018: samsung.com]
E(2).3	The Company has taken appropriate action	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: Engages with affected stakeholders: In the company's 2019 Sustainability Report it says, "Throughout 2018 and 2019, we conducted a Human Rights Impact Assessment (HRIA) for Samsung Electronics Vietnam (SEV) in collaboration with Business for Social Responsibility (BSR), a global non-profit organization specializing in human rights... In addition, BSR's assessment included external stakeholders interviews on-site at SEV, in Vietnam, and globally, as well as an extensive document review and interview with employees and management...To actively communicate and engage with our stakeholders, we held a stakeholder engagement forum in Vietnam with approximately 300 stakeholders". These stakeholders included women's advocacy groups, and the topic was "Gender Equality and Integration in the Digital Era". [2019 Sustainability Report, 2019: images.samsung.com] • Not met: Provides remedies to affected stakeholders: CHRB did not find evidence of the Company providing remedies to the affected women workers. • Met: Has reviewed management systems to prevent recurrence: The company says that in 2018-2019 "We conducted a Human Rights Impact Assessment (HRIA) for Samsung Electronics Vietnam (SEV) in collaboration with Business for Social Responsibility (BSR), a global non-profit organization specializing in human rights....We set the following goals of the HRIA for assessing SEV's human rights policy and management system: 1) identifying factors that affect human rights; 2) making recommendations to mitigate risks and maximize opportunities; and 3) improving human rights management by empowering employees and other stakeholders based on constructive dialogue". [2019 Sustainability Report, 2019: images.samsung.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Remedies are satisfactory to the victims: The CHRB did not find evidence of the Company providing remedies to the affected women workers. • Met: Has improved systems and engaged affected stakeholders: The company says it engaged with employees and management during the HRIA assessment and also hosted a stakeholder engagement forum in Vietnam, with the topic of discussion being "Gender Equality and Integration in the Digital Era". Additionally, the company says that "we are implementing various systems to improve our employees' welfare. To allow our employees to work in safer conditions, we operate in-house hospitals with a total of 93 hospital beds. We are also operating 22 Mommy Room's for expectant mother employees and in-house hospital with gynaecologists." [2019 Sustainability Report, 2019: images.samsung.com]
E(3).0	Serious allegation No 3		<ul style="list-style-type: none"> • Headline: Samsung Electronics' chairman and group executive convicted of charges of union sabotage • Area: FoA and CB • Story: On September 27, 2018, prosecutors from the Seoul Central District Prosecutors' Office indicted the Chairman of Samsung Electronics' board of directors, Mr Lee Sang-hoon, along with 31 persons and entities affiliated with the Samsung Group over allegations of sabotaging unions. <p>On December 18, 2019, Mr Lee Sang-hoon was sentenced by the Seoul Central District Court to 18 months in prison for breaching labour union-related laws. In addition, 25 other defendants were convicted, including former and current employees within Samsung Electronics and its affiliates.</p> <p>The sentence pertains to union-busting allegations. According to the jury, the Company used various tactics to impede union formation and activities including threatening employees linked to unions with wage cuts or with sensitive personal information, withdrawing business from subcontractors who appeared union-friendly, and delaying negotiations between labour unions and management, amongst others. Such tactics were allegedly detailed in company documents, which were distributed to affiliates. Mr Lee Sang-hoon was found guilty of leading</p>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>these union sabotaging schemes when he was acting as chief financial officer in 2013, press sources reported.</p> <p>The verdict follows a similar ruling on December 13, 2019, in which Samsung Electronics Vice-President Kang Kyung-hoon was sentenced to 16 months in prison on charges of union-busting at the amusement park affiliate Samsung Everland.</p> <p>• Sources: [Reuters, 28/09/2018: reuters.com][Nikkei, 28/09/2018: asia.nikkei.com][Ars Technica - 18/12/2019: arstechnica.com][The Financial Times - 17/12/2019: ft.com]</p>
E(3).1	The Company has responded publicly to the allegation	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Public response available: Following the verdict which jailed its chairperson, Samsung issued the following apology: “We humbly accept that the companies’ understanding and view towards labor unions in the past fell short of society’s expectations,” adding: “We will endeavor to build a forward-looking and productive labor-management relationship based on the respect for our employees.” [Reuters article on union sabotage in South Korea, 28/09/18: reuters.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Response goes into detail: Though Samsung issued an apology, there is not enough detail to qualify as a detailed response.
E(3).2	The Company has appropriate policies in place	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Company policies address the general issues raised: The Company states that “Samsung respects and protects the fundamental human rights taking into account international human rights principles and standards set forth in [...], the ILO Declaration on Fundamental Principles and Rights at Work, and the laws of the countries in which we operate.” [Business Conduct Guidelines 2016, 2016: samsung.com] • Met: Policies apply to the type of business relationships involved: The policy also applies to the Company’s business partners. [Samsung Electronics Supplier Code of Conduct, 2017: samsung.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Policies address the specific rights in question: The Company does not disclose its measures to prohibit retaliation against union activities.
E(3).3	The Company has taken appropriate action	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Engages with affected stakeholders: CHRB did not find the evidence of the Company’s engagement with affected stakeholders. • Not met: Encourages linked business to engage affected stakeholders: CHRB could not find the evidence of the Company’s encouraging its business partners to engage with the affected stakeholders. • Not met: Provides remedies to affected stakeholders: CHRB did not find evidence of the Company providing remedies. • Not met: Has reviewed management systems to prevent recurrence: Samsung Electronics heir and Vice Chairman Lee Jae-yong ‘vowed to ban the “no labor union” principle that ran deep at Samsung for the past 50 years’, according to the press. However, no further details found about how this was implemented. [S. heir pledges not to pass on group control to children, 06/05/2020: koreaherald.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Remedies are satisfactory to the victims • Not met: Has improved systems and engaged affected stakeholders: CHRB did not find evidence of the Company improving the system or engaging with stakeholders followed by the case.

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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