

**Company Name** Tapestry  
**Industry** Apparel (Supply Chain only)  
**UNGP Core Score (\*)** 5.0 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
0	2	A.1.4 Commitment to engage with stakeholders
0	2	A.1.5 Commitment to remedy
<b>Embedding respect and Human Rights Due Diligence</b>		
Embedding respect		
0	2	B.1.1 Embedding - Responsibility and resources for day-to-day human rights functions
Human Rights Due Diligence (HRDD)		
0	2	B.2.1 HRDD - Identifying: Processes and triggers for identifying human rights risks and impacts
0	2	B.2.2 HRDD - Assessing: Assessment of risks and impacts identified (salient risks and key industry risks)
0	2	B.2.3 HRDD - Integrating and Acting: Integrating assessment findings internally and taking appropriate action
0	2	B.2.4 HRDD - Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts
0	2	B.2.5 HRDD - Reporting: Accounting for how human rights impacts are addressed
<b>Remedies and Grievance Mechanisms</b>		
1.5	2	C.1 Grievance channels/mechanisms to receive complaints or concerns from workers
2	2	C.2 Grievance channels/mechanisms to receive complaints or concerns from external individuals and communities
0	2	C.7 Remedying adverse impacts and incorporating lessons learned
<b>5.0</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: UNGC principles 1 &amp; 2: In September 2018, the Company sent its commitment letter to Global Compact, where it states: 'Tapestry, Inc. supports the Ten Principles of the United Nations Global Compact on human rights, labour, environment and anti-corruption. With this communication, we express our intent to implement those principles throughout our company and our brands. We are committed to making the UN Global Compact and its principles part of the strategy, culture and day-to day operations of our company'. [Commitment Letter to Global Compact, 09/2018: <a href="https://s3-us-west-2.amazonaws.com">s3-us-west-2.amazonaws.com</a>]</li> <li>• Not met: UDHR</li> <li>• Not met: International Bill of Rights</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>• Not met: ILO Core: The Company's code of conduct includes explicit commitment in relation to some ILO core areas: Discrimination, and Child Labour. However the Company has not disclosed specific commitments in relation to ILO core areas of forced labour, freedom of association and collective bargaining. [Code of Conduct, 2017: <a href="https://media.corporate-ir.net">media.corporate-ir.net</a> &amp; Global Operation Principles: <a href="https://media.corporate-ir.net">media.corporate-ir.net</a>]</li> <li>• Met: UNGC principles 3-6: In September 2018, the Company sent its commitment letter to Global Compact, where it states: 'Tapestry, Inc. supports the Ten Principles of the United Nations Global Compact on human rights, labour, environment and anti-corruption. With this communication, we express our intent to implement those principles throughout our company and our brands. We are committed to making the UN Global Compact and its principles part of the strategy, culture and day-to day operations of our company'. [Commitment Letter to Global Compact, 09/2018: <a href="https://s3-us-west-2.amazonaws.com">s3-us-west-2.amazonaws.com</a>]</li> <li>• Not met: Explicitly list ALL four ILO for AP suppliers: Regarding suppliers, the supplier code of conduct contains clear requirements on some ILO Core areas: Child Labour, Forced Labour and Discrimination. However, the commitment included in the supplier code of conduct referred to Freedom of Association and Collective Bargaining is not sufficient: 'Suppliers must respect the legal rights of employees to freely and without harassment participate in worker organizations of their choice, and to refrain from joining organizations if that is their wish. Suppliers must not threaten or penalize employees for their efforts to organize or bargain collectively where permitted by the laws of the country of manufacture, nor may they discriminate against workers as a result of any such organization affiliation.' The commitment to fully respect freedom of association does not extend to collective bargaining, where the Company asked only to not threaten or penalize employees where bargain collectively is permitted by the laws of the country. [Supplier Code of Conduct, 11/2019: <a href="https://tapestry.gcs-web.com">tapestry.gcs-web.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Explicit commitment to All four ILO Core: See above [Code of Conduct, 2017: <a href="https://media.corporate-ir.net">media.corporate-ir.net</a>]</li> <li>• Met: Respect H&amp;S of workers: Its Code of Conduct also includes commitments on workplace safety which cover health and safety issues. [Code of Conduct, 2017: <a href="https://media.corporate-ir.net">media.corporate-ir.net</a>]</li> <li>• Met: H&amp;S applies to AP suppliers: The code for suppliers also contains requirements on health &amp; safety. [Supplier Code of Conduct, 11/2019: <a href="https://tapestry.gcs-web.com">tapestry.gcs-web.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Not met: working hours for workers: Its Code of Conduct states: 'Hours worked each day, and days worked each week, shall not exceed the legal limitations of the countries in which we operate.' However, this is not up to ILO conventions, or refers to maximum of 48 regularly scheduled hours and up to 12 voluntary overtime, and rest periods. [Code of Conduct, 2017: <a href="http://media.corporate-ir.net">media.corporate-ir.net</a>]</li> <li>• Not met: Working hours for AP suppliers: The Suppliers Code of Conduct indicates: 'The Company will not knowingly use suppliers who fail to comply with the legal maximum working hours as specified by each country's standards and laws.' However, as above, it does not refer to ILO conventions or details regular working week, maximum working hours and rest periods. [Supplier Code of Conduct, 11/2019: <a href="http://tapestry.gcs-web.com">tapestry.gcs-web.com</a>]</li> </ul>
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"> <li>• Not met: Commits to stakeholder engagement: The 'Engaging our stakeholders' section of the Sustainability report 2017 identifies stakeholders as 'those groups or individuals who are impacted, and influenced by, or who can impact, our company'. It includes stakeholder groups, engagement topics and examples of engagement. Regarding 'suppliers', an example of engagement is: 'Supplier summits; Adherence to the Supplier Code of Conduct, Global Operating Principles, Animal Welfare Policy and Anti-Corruption Policy; Supplier training for business ethics and anti-corruption'. Regarding communities, however, topics of engagement relate to 'Regional employee volunteering; Team-building meetings with a service component; Giving time and resources through the Coach Foundation and Kate Spade New York Foundation on purpose' and not examples of human rights issues. The Company has not disclosed a commitment to engage with affected stakeholders and their legitimate representatives in the development or monitoring of its human rights approach. [Corporate Responsibility Report 2017, 2018: <a href="http://tapestry.gcs-web.com">tapestry.gcs-web.com</a> &amp; Corporate Responsibility Report 2018, 2019: <a href="http://tapestry.gcs-web.com">tapestry.gcs-web.com</a>]</li> <li>• Not met: Regular stakeholder engagement: See above [Corporate Responsibility Report 2017, 2018: <a href="http://tapestry.gcs-web.com">tapestry.gcs-web.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Commits to engage stakeholders in design: See above [Corporate Responsibility Report 2017, 2018: <a href="http://tapestry.gcs-web.com">tapestry.gcs-web.com</a>]</li> <li>• Not met: Regular stakeholder design engagement: See above [Corporate Responsibility Report 2017, 2018: <a href="http://tapestry.gcs-web.com">tapestry.gcs-web.com</a>]</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: The Company has not disclosed a commitment to remedy the adverse impacts on individuals, workers and communities that it has caused or contributed to. Although it indicates in its Corporate Responsibility Report 2017 that 'at the end of the audit process, if required, our compliance team works diligently with site managers to outline a corrective action plan which identifies strategies for improvement'. [Corporate Responsibility Report 2017, 2018: <a href="http://tapestry.gcs-web.com">tapestry.gcs-web.com</a> &amp; Corporate Responsibility Report 2018, 2019: <a href="http://tapestry.gcs-web.com">tapestry.gcs-web.com</a>]</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.</li> <li>• Not met: Senior responsibility for HR: The Company indicates in its website section 'Global Business Integrity Program' that 'In order to monitor the adherence to these principles, we created a Global Business Standards Committee comprised of senior executives'. According to the 'Global Business integrity program' section on the website, this programme consists of five documents including the code of conduct and the supplier code of conduct. However, it is not clear which are the specific responsibilities of the Committee or its senior executives. [Global Business Integrity Program, 02/2020: <a href="http://tapestry.com">tapestry.com</a>]</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: In the risk section of the Form 10-K 2019, the Company indicates: 'Our business is subject to the risks inherent in global sourcing activities [...] The violation of labour, environmental or other laws by an independent manufacturer or supplier [...], could interrupt or otherwise disrupt the shipment of our products, harm our trademarks or damage our reputation. The occurrence of any of these events could materially adversely affect our business, financial condition and results of operations'. However, the Company does not describe the processes to identify these risks and impacts in specific locations or activities. [2019 Form 10K, 2019: <a href="https://www.tapestry.com/sec-filings">tapestry.gcs-web.com</a>]</li> <li>• Not met: Identifying risks in AP suppliers: See above [2019 Form 10K, 2019: <a href="https://www.tapestry.com/sec-filings">tapestry.gcs-web.com</a>]</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): Although the Company has identified some human rights risks in the Form 10-K (see indicator above), it does not describe the processes for assessing these risks, including how geographical, economic, social and other relevant factors are taken into account. [2019 Form 10K, 2019: <a href="https://www.tapestry.com/sec-filings">tapestry.gcs-web.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>
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</li> <li>• Not met: Lessons learnt from checking effectiveness</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</li> <li>• Not met: Comms plan re assessing risks</li> <li>• Not met: Comms plan re action plans for risks</li> <li>• Not met: Comms plan re reviewing action plans</li> <li>• Not met: Including AP suppliers</li> </ul> <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: The Company's code of conduct states that: ' You may also report a matter (anonymously, if desired) by contacting the Tapestry, Inc. Ethics and Compliance Reporting System online at <a href="https://tapestry.ethicspoint.com">tapestry.ethicspoint.com</a>, or call a representative, at 1.800.396.1807 (for matters in the United States) or the international phone numbers available at <a href="https://tapestry.com">tapestry.com</a> under 'Contacting the Board'. The Code of conduct contains commitments on some ILO core areas. Ethics and Compliance Reporting System is available for all employees, business partners, and members of the general public. [Code of Conduct, 2017: <a href="https://media.corporate-ir.net">media.corporate-ir.net</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Number grievances filed, addressed or resolved</li> <li>• Met: Channel is available in all appropriate languages: Tapestry Ethics and Compliance Reporting System is available online in 10 different languages including Hindi, Thai, Spanish, Vietnamese, Korean and Chinese. [Ethics Point Hotline, 02/2020: <a href="https://secure.ethicspoint.com">secure.ethicspoint.com</a>]</li> <li>• Not met: Expect AP supplier to have equivalent grievance systems [Supplier Code of Conduct, 06/2018: <a href="https://tapestry.gcs-web.com">tapestry.gcs-web.com</a>]</li> <li>• Met: Opens own system to AP supplier workers: The Supplier code of conduct provides channels to contact directly to the Company. Specifically, this code states that: ' If you have questions, need to make disclosures, or are concerned about conduct that you believe violates the Company's standards or the law, contact the Law Department at 212-615-2436. You may also report a matter (anonymously, if desired) by contacting the Tapestry Ethics and Compliance Reporting System online at <a href="https://tapestry.ethicspoint.com">tapestry.ethicspoint.com</a>, or call a representative, at 1-800-396-1807 (for matters in the United States) or the international phone numbers available at <a href="https://tapestry.com">tapestry.com</a> under the Contacting the Board section. ' [Supplier Code of Conduct, 11/2019: <a href="https://tapestry.gcs-web.com">tapestry.gcs-web.com</a> &amp; Ethics Point Hotline, 02/2020: <a href="https://secure.ethicspoint.com">secure.ethicspoint.com</a>]</li> </ul>
C.2	Grievance channel(s)/mechanism(s) to receive complaints or concerns from external individuals and communities	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Grievance mechanism for community: In its Ethics Point Hotline website the Company indicates: 'Through this site, employees, business partners and members of the general public may report their concerns confidentially and, if desired, anonymously.' [Ethics Point Hotline, 02/2020: <a href="https://secure.ethicspoint.com">secure.ethicspoint.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Describes accessibility and local languages: The Ethics Point Hotline website is available in 10 languages including Hindi, Thai, Korean, Chinese, Vietnamese, Spanish and English. [Ethics Point Hotline, 02/2020: <a href="https://secure.ethicspoint.com">secure.ethicspoint.com</a>]</li> <li>• Not met: Expects AP supplier to have community grievance systems</li> <li>• Met: AP supplier communities use global system: See above [Ethics Point Hotline, 02/2020: <a href="https://secure.ethicspoint.com">secure.ethicspoint.com</a>]</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		<ul style="list-style-type: none"> <li>• Headline: Apex Tannery and Bay Tanneries linked to child labor, safety hazards, and other violations</li> <li>• Area: Child labour</li> <li>• Story: A report by Transparentem alleges children as young as 14 are made to work at the Apex and Bay Tanneries in Bangladesh, both of which supply leather that has been traced to luxury brand labels including Coach (now Tapestry). The allegations focus on the Hazaribagh neighborhood, a hub of Bangladesh's leather industry which has over 150 tanneries. The Company said they get no more than 1.5 percent of their leather from Hazaribagh.</li> <li>• Sources: [Associated Press - 25/03/2017: <a href="https://apnews.com">apnews.com</a>][PBS - 29/03/2017: <a href="https://pbs.org">pbs.org</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
E(1).1	The Company has responded publicly to the allegation	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Met: Public response available: The Company said that it sources no more than 1.5 percent of their leather from Hazaribagh. [AP article on Child Labour, 2017: <a href="http://apnews.com">apnews.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Not met: Response goes into detail</li> </ul>
E(1).2	The Company has appropriate policies in place	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Met: Company policies address the general issues raised: The Company's code of conduct includes explicit commitment to prohibit child labour. [Code of Conduct, 2017: <a href="http://media.corporate-ir.net">media.corporate-ir.net</a> &amp; Global Operation Principles: <a href="http://media.corporate-ir.net">media.corporate-ir.net</a>]</li> <li>Met: Policies apply to the type of business relationships involved: The Company's supplier code of conduct contains clear requirements on regarding Child Labour. [Supplier Code of Conduct, 06/2018: <a href="http://tapestry.gcs-web.com">tapestry.gcs-web.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Not met: Policies address the specific rights in question: CHRB could not find the evidence of the Company's age verification process.</li> </ul>
E(1).3	The Company has taken appropriate action	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Not met: Engages with affected stakeholders: CHRB did not find the evidence of the Company's engagement with affected stakeholders.</li> <li>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.</li> <li>Not met: Provides remedies to affected stakeholders: CHRB did not find evidence of the Company providing remedies.</li> <li>Not met: Has reviewed management systems to prevent recurrence: CHRB did not find evidence of the Company reviewing the system followed by the case.</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Not met: Remedies are satisfactory to the victims</li> <li>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.</li> </ul>

## Disclaimer

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

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

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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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