

## Corporate Human Rights Benchmark 2020 Company Scoresheet

**Company Name** Tesco  
**Industry** Agricultural Products & Apparel (Supply Chain only)  
**UNGP Core Score (\*)** 21.5 out of 26

Score	Out of	For indicators
<b>Governance and Policy Commitments</b>		
2	2	A.1.1 Commitment to respect human rights
2	2	A.1.2 Commitment to respect the human rights of workers
2	2	A.1.4 Commitment to engage with stakeholders
1.5	2	A.1.5 Commitment to remedy
<b>Embedding respect and Human Rights Due Diligence</b>		
Embedding respect		
2	2	B.1.1 Embedding - Responsibility and resources for day-to-day human rights functions
Human Rights Due Diligence (HRDD)		
2	2	B.2.1 HRDD - Identifying: Processes and triggers for identifying human rights risks and impacts
2	2	B.2.2 HRDD - Assessing: Assessment of risks and impacts identified (salient risks and key industry risks)
2	2	B.2.3 HRDD - Integrating and Acting: Integrating assessment findings internally and taking appropriate action
1	2	B.2.4 HRDD - Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts
0.5	2	B.2.5 HRDD - Reporting: Accounting for how human rights impacts are addressed
<b>Remedies and Grievance Mechanisms</b>		
1.5	2	C.1 Grievance channels/mechanisms to receive complaints or concerns from workers
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
21.5	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"> <li>• Met: General HRs commitment: The Company states in its Position Statement: 'We are committed to upholding human rights and support in full the United Nations (UN) Universal Declaration of Human Rights and the International Labour Organization (ILO) Core Conventions [...]' [Our approach to human rights (website), 27/05/2020: <a href="https://tescoplc.com">tescoplc.com</a>]</li> <li>• Met: UDHR: The Company states in its Position Statement: 'We are committed to upholding human rights and support in full the United Nations (UN) Universal Declaration of Human Rights and the International Labour Organization (ILO) Core Conventions [...]' [Our approach to human rights (website), 27/05/2020: <a href="https://tescoplc.com">tescoplc.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: UNGPs: The Modern slavery statement reads: 'At the heart of our approach to human rights are a number of important internationally recognised declarations, standards and codes. These are the foundations for how we work across the Tesco Group, and include: [...] The UN Guiding Principles on Business and Human Rights [...]. We follow a robust due diligence process that was developed in line with the UN Guiding Principles on Business and Human Rights'. However, 'to be a foundation' or 'to be in line with' also do not qualify as a commitment according to CHRB wording criteria. Nevertheless, the Company states in its Supplier Code: 'We are committed to upholding human rights and fully support the UN Universal Declaration of Human Rights, [...], the UN Guiding Principles on Business and Human Rights and the UN Global Compact.' [Human rights requirements for food and grocery non food suppliers, 01/10/2018: <a href="https://tescoplc.com">tescoplc.com</a> &amp; Modern Slavery Statement 2019/20, 2020: <a href="https://tescoplc.com">tescoplc.com</a>]</li> </ul>
A.1.2	Commitment to respect the human rights of workers	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: ILO Core: The company states in their HR Statement: 'We are committed to upholding human rights and support in full the United Nations (UN) Universal Declaration of Human Rights and the International Labour Organization (ILO) Core Conventions on labour standards, working hours and health and safety for workers.' [Our approach to human rights (website), 27/05/2020: <a href="https://tescoplc.com">tescoplc.com</a>]</li> <li>• Met: UNGC principles 3-6: In addition, the Company indicates: 'we have joined the UN Global Compact'. [Promoting Human Rights at Tesco (Position statement - web), 11/04/2019: <a href="https://tescoplc.com">https://tescoplc.com</a>]</li> <li>• Met: Explicitly list All four ILO for AG suppliers: The Company's 'Human rights requirements for food and grocery non food suppliers' document reads: 'Suppliers and sites are expected to read and implement the requirements, in addition to ensuring all sites are compliant with the ETI base code.' The Base Code of the ETI includes requirements in each of the ILO core areas. In relation to Freedom of Association and Collective bargaining, the ETI code also states that 'where the right of freedom of association and collective bargaining is restricted under law, the employer facilitates, and does not hinder, the development of parallel means for independent and free association and bargaining'. [Human rights requirements for food and grocery non food suppliers, 01/10/2018: <a href="https://tescoplc.com">tescoplc.com</a> &amp; ETI Base Code, 04/2018: <a href="https://ethicaltrade.org">https://ethicaltrade.org</a> Base Code %28English%29.pdf]</li> <li>• Met: Explicitly list ALL four ILO for AP suppliers: The Company's 'Human rights requirements for food and grocery non food suppliers' document reads: 'Suppliers and sites are expected to read and implement the requirements, in addition to ensuring all sites are compliant with the ETI base code.' The Base Code of the ETI includes requirements in each of the ILO core areas. In relation to Freedom of Association and Collective bargaining, the ETI code also states that 'where the right of freedom of association and collective bargaining is restricted under law, the</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>employer facilitates, and does not hinder, the development of parallel means for independent and free association and bargaining'. [Human rights requirements for food and grocery non food suppliers, 01/10/2018: <a href="https://tescoplc.com">tescoplc.com</a> &amp; ETI Base Code, 04/2018: <a href="https://ethicaltrade.org">https://ethicaltrade.org</a> Base Code %28English%29.pdf]</p> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Explicit commitment to All four ILO Core: The Company states on its website, 'Our approach to human rights', included in the 'Policies' section': 'We are committed to upholding human rights and support in full the United Nations (UN) Universal Declaration of Human Rights and the International Labour Organization (ILO) Core Conventions on freedom of association and collective bargaining, forced labour, child labour and discrimination at work'. [Our approach to human rights (website), 27/05/2020: <a href="https://tescoplc.com">tescoplc.com</a>]</li> <li>• Met: Respect H&amp;S of workers: The company indicates in the HR Position Statement: 'We are committed to upholding human rights and support in full the United Nations (UN) Universal Declaration of Human Rights and the International Labour Organization (ILO) Core Conventions on labour standards, working hours and health and safety for workers'. [Promoting Human Rights at Tesco (Position statement - web), 11/04/2019: <a href="https://tescoplc.com">https://tescoplc.com</a>]</li> <li>• Met: H&amp;S applies to AG suppliers: As indicated above, 'Adherence to these requirements is a condition of supply to Tesco. Suppliers and sites are expected to read and implement the requirements, in addition to ensuring all sites are compliant with the ETI base code.' ETI base Code include health and safety requirements. [Human rights requirements for food and grocery non food suppliers, 01/10/2018: <a href="https://tescoplc.com">tescoplc.com</a> &amp; ETI Base Code, 04/2018: <a href="https://ethicaltrade.org">https://ethicaltrade.org</a> Base Code %28English%29.pdf]</li> <li>• Met: H&amp;S applies to AP suppliers: As indicated above, 'Adherence to these requirements is a condition of supply to Tesco. Suppliers and sites are expected to read and implement the requirements, in addition to ensuring all sites are compliant with the ETI base code'. ETI base Code include health and safety requirements. [Human rights requirements for food and grocery non food suppliers, 01/10/2018: <a href="https://tescoplc.com">tescoplc.com</a> &amp; ETI Base Code, 04/2018: <a href="https://ethicaltrade.org">https://ethicaltrade.org</a> Base Code %28English%29.pdf]</li> <li>• Met: working hours for workers: Also in its HR Position Statement, the Company indicates: 'We are committed to upholding human rights and support in full the United Nations (UN) Universal Declaration of Human Rights and the International Labour Organization (ILO) Core Conventions on labour standards, working hours and health and safety for workers'. [Promoting Human Rights at Tesco (Position statement - web), 11/04/2019: <a href="https://tescoplc.com">https://tescoplc.com</a>]</li> <li>• Met: Working hours for AP suppliers: As indicated above, 'Adherence to these requirements is a condition of supply to Tesco. Suppliers and sites are expected to read and implement the requirements, in addition to ensuring all sites are compliant with the ETI base code'. The ETI code contains requirements on working hours and meets international standards. [Human rights requirements for food and grocery non food suppliers, 01/10/2018: <a href="https://tescoplc.com">tescoplc.com</a> &amp; ETI Base Code, 04/2018: <a href="https://ethicaltrade.org">https://ethicaltrade.org</a> Base Code %28English%29.pdf]</li> </ul>
A.1.4	Commitment to engage with stakeholders	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: Regular stakeholder engagement: The Company reports engagement with trade unions both for insight to design due diligence and monitoring performance. In addition, the Company also discloses worker interviews in the worker own language as part of the audit process. [Our approach to human rights (website), 27/05/2020: <a href="https://tescoplc.com">tescoplc.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Regular stakeholder design engagement: The Company states that 'over the past two years we have put in place a due diligence process to ensure that we are identifying and then focusing our resource in areas of highest risk, wherever this is in the supply chain. The process was developed in consultation with over fifty internal and external stakeholders, including suppliers, industry bodies such as the British Retail Consortium, Government bodies and civil society groups such as unseen, Oxfam and the Ethical Tea partnership [...] At the core of this framework is engagement and insight from NGOs, trade unions, multi-stakeholder groups and other organisations who can help us identify areas of greatest risk'. [Our approach to human rights (website), 27/05/2020: <a href="https://tescoplc.com">tescoplc.com</a>]</li> </ul>
A.1.5	Commitment to remedy	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: Commits to remedy: The Company indicates on its website: 'We recognize the need for workers to have access to UN Guiding Principle-compliant grievance mechanisms, and for remediation to be provided when human rights breaches</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>occur. We are publicly committed to supporting, and not impeding access to state-based judicial or non-judicial mechanisms. We do not require individuals or communities participating in a grievance process to permanently waive their legal rights to bring a claim through a judicial process as a condition of participating in the grievance process. [...] We are committed to work closely with at least three of our high-risk supply chains to ensure that by the end of 2020, workers, and where relevant smallholder farmers, have access to appropriate grievance mechanisms and remedy, in accordance with the UN Guiding Principles.' In addition, the Company has a specific commitment in the context of slavery: 'Starting with our own business operations and service providers, and then increasing the visibility we have of our global supply chains, we work to identify actual or potential risks of modern slavery and help ensure remediation where cases are identified'. [Modern Slavery Statement 2019/20, 2020: <a href="https://www.tescopl.com">tescoplc.com</a> &amp; Our approach to human rights (website), 27/05/2020: <a href="https://www.tescopl.com">tescoplc.com</a>]</p> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Not obstructing access to other remedies: The Company indicates that 'We are publicly committed to supporting, and not impeding access to state-based judicial or non-judicial mechanisms. We do not require individuals or communities participating in a grievance process to permanently waive their legal rights to bring a claim through a judicial process as a condition of participating in the grievance process'. [Our approach to human rights (website), 27/05/2020: <a href="https://www.tescopl.com">tescoplc.com</a>]</li> <li>• Met: Collaborating with other remedy initiatives: The Company works with Issara Institute, which is involved in remediation, as explained below. The Company also states that 'Unseen will also support us in ensuring remediation for victims if cases of modern slavery are identified'. [Tesco and multi-stakeholder initiatives for responsible sourcing (website), 17/01/2020: <a href="https://www.tescopl.com">tescoplc.com</a> &amp; Modern Slavery Statement 2018/2019, 05/2019: <a href="https://www.tescopl.com">tescoplc.com</a>]</li> <li>• Not met: Work with AG suppliers to remedy impacts: The Company states that 'We are committed to work closely with at least three of our high-risk supply chains to ensure that by the end of 2020, workers, and where relevant smallholder farmers, have access to appropriate grievance mechanisms and remedy, in accordance with the UN Guiding Principles'. Moreover, the Company's 'Human Rights requirements for food and grocery non food suppliers' document, indicates: 'Where a supplier is identified to have caused or contributed to a negative human rights impact, we expect them to actively engage in bringing about remediation, working alone or in cooperation with other actors.' In addition, the Company indicates in its MSA 2019 that its partnership with the Issara Institute 'ensures our highest risk supply chains in Thailand are monitored independently. Their key focus is on enabling workers to raise their own concerns and ensure they are addressed which is crucial for the empowerment of migrant workers who are often vulnerable to exploitation'. 'They are now able to provide support to 20,000 workers across the seafood, poultry and agriculture sector'. However, it is not clear how the Company is committed to work with the supplier in remedy provision, or evidence of collaboration with them in providing it, either through the suppliers' mechanisms, or through the development of third party non-judicial remedies. [Human rights requirements for food and grocery non food suppliers, 01/10/2018: <a href="https://www.tescopl.com">tescoplc.com</a> &amp; Our approach to human rights (website), 27/05/2020: <a href="https://www.tescopl.com">tescoplc.com</a>]</li> <li>• Not met: Work with AP suppliers to remedy impacts: The Company describes its grievance mechanisms and how suppliers can use it. The Company also describes how it works to identify and rectify abuses in supply chains, including partnering with charities and NGOs as required, particularly in the context of agriculture. In addition, the Company states: 'We are committed to work closely with at least three of our high-risk supply chains to ensure that by the end of 2020, workers, and where relevant smallholder farmers, have access to appropriate grievance mechanisms and remedy, in accordance with the UN Guiding Principles.' Moreover, the Company's 'Human Rights requirements for food and grocery non food suppliers' document, indicates: 'Where a supplier is identified to have caused or contributed to a negative human rights impact, we expect them to actively engage in bringing about remediation, working alone or in cooperation with other actors.' No specific details found regarding apparel supply chain. [Our approach to human rights (website), 27/05/2020: <a href="https://www.tescopl.com">tescoplc.com</a> &amp; Human rights requirements for food and grocery non food suppliers, 01/10/2018: <a href="https://www.tescopl.com">tescoplc.com</a>]</li> </ul>

## Embedding Respect and Human Rights Due Diligence

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.1	Responsibility and resources for day-to-day human rights functions	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Commits to ILO core conventions: See indicator A.1.2. The Company is signatory to the UN Global Compact.</li> <li>• Met: Senior responsibility for HR: The Company indicates that 'Our human rights strategy is led by the Group Responsible Sourcing Director, within our Product division (report to chief Product Officer)'. [Modern Slavery Statement 2019/20, 2020: <a href="https://www.tescopl.com">tescoplc.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Day-to-day responsibility: The Company indicates: 'Our work on human rights is fully integrated within our operations, forming a key part of our broader strategy for responsibility and sustainability as laid out in the key commitments of our Little Helps Plan. For Tesco UK, our human rights strategy is led by our Responsible Sourcing Director who reports to our Group Quality Director and Chief Product Officer and who are responsible for product sourcing across all Tesco's retail businesses.' Seems to replicate corporate structure at country level. [Our approach to human rights (website), 27/05/2020: <a href="https://www.tescopl.com">tescoplc.com</a>]</li> <li>• Met: Day-to-day responsibility for AG in supply chain: In addition, it states: 'On a day-to-day basis, colleagues in our commercial and technical teams manage supplier and site relationships, and ethical requirements with support from a specialist responsible sourcing team, including dedicated local staff in 9 key sourcing countries. In 2019 we also established a new role within the responsible sourcing team in the UK, which is solely responsible for supporting the integration of responsible sourcing into supplier plans and purchasing practices'. [Our approach to human rights (website), 27/05/2020: <a href="https://www.tescopl.com">tescoplc.com</a>]</li> <li>• Met: Day-to-day responsibility for AP in supply chain: Same as above. [Our approach to human rights (website), 27/05/2020: <a href="https://www.tescopl.com">tescoplc.com</a>]</li> </ul>
B.2.1	Identifying: Processes and triggers for identifying human rights risks and impacts	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: Identifying risks in own operations: The Company indicates that 'We now have a broader due diligence process to ensure that we are identifying and then focusing our resource in areas of highest risk, wherever this is in the supply chain. [...] Our risk assessment enables us to identify our highest areas of risk and to work out our priorities for the next three to five years. Regarding the Company's own operations, 'our risk assessment process has identified that the greatest risks of forced labour come from service providers such as temporary workers in distribution, office cleaners or carwashes. This is because of the significant proportion of migrant workers in these sectors, in many of the countries we operate in, who may be less aware of their rights and more vulnerable to abuse. It is also because we have less direct visibility over these areas, relative to areas where we directly employ workers'. Moreover, 'Our risk assessment framework for own-brand products looks at five metrics, which have the potential to increase the vulnerability of workers. [...] These risk metrics are then mapped end to end in our key supply chains, allowing us to identify the most salient supply chain risks, wherever they occur'. [Our approach to human rights (website), 27/05/2020: <a href="https://www.tescopl.com">tescoplc.com</a>]</li> <li>• Met: Identifying risks in AG suppliers: Regarding products from its supply chains, the Company indicates: 'In our supply chains, we are prioritising work on our four themes in the countries where Tesco UK's top 20 products and ingredients are sourced from. The top 20 are those products and ingredients most regularly bought by customers which have the biggest sustainability impact where we have the ability to drive change. Twelve of these 'Top 20' have significant and systemic human rights risks associated with them (these risks are most pronounced in the lower tiers of our supply chains) and will therefore be our immediate priorities for the next three to five years [...] Outside of these top 20 products and ingredients, we focus on an additional seven regions and issues because of the known risks associated with them and/or their commercial importance to our business'. [Our approach to human rights (website), 27/05/2020: <a href="https://www.tescopl.com">tescoplc.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Met: Identifying risks in AP suppliers: Among the seven regions and issues mentioned above, are all non-food factories across Asia, which the main issues are 'livelihoods and working hours, health and safety, worker representation' and Indian spinning mills with forced labour, gender equality issues. In addition, the Company indicates on its website: 'In 2019, we initiated a HRIA in the Vietnamese Prawn supply chain. This assessment is due for completion in 2020 will enable us to obtain a greater understanding of how our sourcing impacts workers and their communities. We are committed to carrying at least 2 further HRIAs by the end of 2021'. [Our work on human rights - 2018 update, 11/2018: <a href="https://www.tescopl.com/sustainability/tescoplc.com">sustainability.tescopl.com</a> &amp; Our approach to human rights (website), 27/05/2020: <a href="https://www.tescopl.com">tescoplc.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Ongoing global risk identification: The company indicates that 'We now have a broader due diligence process to ensure that we are identifying and then focusing our resource in areas of highest risk, wherever this is in the supply chain. The process was developed in consultation with over fifty internal and external stakeholders, including suppliers, multi-stakeholder bodies such as the Ethical Trading Initiative, trade unions, civil society groups such as Unseen and Oxfam and government bodies'. As explained above, and below, it also carried out, and is carrying out processes in own operations. [Our approach to human rights (website), 27/05/2020: <a href="https://www.tescopl.com">tescoplc.com</a>]</li> <li>• Met: In consultation with stakeholders: As indicated above: 'The process was developed in consultation with over fifty internal and external stakeholders, including suppliers, multi-stakeholder bodies such as the Ethical Trading Initiative, trade unions, civil society groups such as Unseen and Oxfam and government bodies'. [Our approach to human rights (website), 27/05/2020: <a href="https://www.tescopl.com">tescoplc.com</a>]</li> <li>• Met: In consultation with HR experts: As mentioned above, in the due diligence process some of the civil society groups consulted included Unseen, Oxfam and Ethical Tea Partnership. [Our approach to human rights (website), 27/05/2020: <a href="https://www.tescopl.com">tescoplc.com</a>]</li> <li>• Met: Triggered by new circumstances: The Company reports in its Modern slavery statement: 'In September 2019 we commissioned Impactt, a well-regarded independent human rights consultancy, to conduct an assessment of migrant workers' rights in our stores and distribution centres in Thailand and Malaysia. This was because of a number of potential concerns that had been identified by internal colleagues.' [Modern Slavery Statement 2019/20, 2020: <a href="https://www.tescopl.com">tescoplc.com</a>]</li> <li>• Met: Explains use of HRIAs or ESIA (inc HR): The Company indicates that 'we are committed to evolving and developing the tools we use to measure our human rights impact as a business. [...] As part of our new strategy, we are continually exploring supplementary tools to audits. This includes a commitment to conduct Human Rights Impact Assessments (HRIAs) to understand if they provide a clearer understanding of the impact which Tesco's trade has on workers and their communities'. In addition, in its MSA 2020, the Company reports: 'In September 2019 we commissioned Impactt, a well-regarded independent human rights consultancy, to conduct an assessment of migrant workers' rights in our stores and distribution centres in Thailand and Malaysia. This was because of a number of potential concerns that had been identified by internal colleagues'. [Our approach to human rights (website), 27/05/2020: <a href="https://www.tescopl.com">tescoplc.com</a> &amp; Modern Slavery Statement 2019/20, 2020: <a href="https://www.tescopl.com">tescoplc.com</a>]</li> </ul>
B.2.2	Assessing: Assessment of risks and impacts identified (salient risks and key industry risks)	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Salient risk assessment (and context): The risk assessment framework is built around country of origin, type of work, type of labour (permanent, seasonal, through an agency), known cultural or community issues (identifying any endemic challenges), and supply chain capability. 'These risk metrics are then mapped end to end in our key supply chains'. In relation to its own operations, the Company has mapped the UK service providers in its offices, retail operations, property, distribution, HR and in specialist services such as IT and car washing and identified which have higher risk based on their contract type, level of skill involved in the work, wages and visibility of the service provider. Priority sectors identified include workers who build the Company's stores, agency labour in distribution and logistics, workers in security for offices, cleaning staff and car wash supplier [Our approach to human rights (website), 27/05/2020: <a href="https://www.tescopl.com">tescoplc.com</a>]</li> </ul>



Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Met: Public disclosure of salient risks: The Company indicates that 12 of the top 20 products and ingredients 'have significant and systemic human rights associated', and discloses the type of product and the risk associated, for instance, in cotton the risks are forced and child labour, and in bananas are livelihoods and worker representation. In addition, it also focus in specific regions and issues and discloses which these are including for instance forced labour in Spanish salads or 'accommodation standards in the UK agriculture'. [Our approach to human rights (website), 27/05/2020: <a href="https://www.tescoplc.com">tescoplc.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Both requirements under score 1 met</li> </ul>
B.2.3	Integrating and Acting: Integrating assessment findings internally and taking appropriate action	2	<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: Action Plans to mitigate risks: The Company indicates: 'Once we have identified our priorities, we then seek to work collaboratively with our suppliers, wider industry, civil society and, where appropriate, policy-makers to mitigate human rights risks - i.e. what steps can we take to avoid, reduce or manage those risks. This may include ethical audits, collaborative projects or training workers to understand their human rights'. The approach is based on three pillars: 'improving standards for people working in our own operations and our supply chains through continuous improvement programmes with suppliers, driving transformative industry-wide efforts to address endemic labour and community issues, and using our convening power to advocate for change'. [Our approach to human rights (website), 27/05/2020: <a href="https://www.tescoplc.com">tescoplc.com</a>]</li> <li>• Met: Including in AG supply chain: The system described above covers both own operations and supply chain. Following the topics and products of risk considered in assessment, the company provides some examples. For instance, 'we have recently incorporated sustainable livelihoods for workers and smallholder farmers as one of four themes in our revised human rights strategy, in recognition of the need for workers and farmers to receive a fair share of the value they contribute to a company's products. We acknowledge that legal minimum wages may not be sufficient to meet workers' needs and in high risk supply chains, we work with suppliers to understand these issues further. (...) Examples of this work include our involvement in the Malawi 2020 tea project, which has specific targets to pay living wages to workers by 2020, and our involvement, in the Living Wage Advocacy Initiative, part of the World Banana Forum'. [Our approach to human rights (website), 27/05/2020: <a href="https://www.tescoplc.com">tescoplc.com</a>]</li> <li>• Met: Including in AP supply chain: The system described above covers both own operations and supply chain. In relation to apparel, the Company provides the following example: 'In parts of the garment industry in southern India, workers have been recruited through contracts under which they are paid a lump sum at the end of a three-year period, and have restrictions placed on their movement. This leaves them vulnerable to abuse. We have continued to monitor our direct suppliers closely and work through the ETI to ensure this practice does not take place'. [Modern Slavery Statement 2018/2019, 05/2019: <a href="https://www.tescoplc.com">tescoplc.com</a>]</li> <li>• Met: Example of Actions decided: In the case of own operations and service providers, the Company indicates that 'dedicated head office staff work closely with all service providers, as well as our internal People function, Distribution Centre and Security Managers to help address risks. This includes training staff to spot potential indicators of modern slavery. In 2019 we reviewed our ethical audit requirements for suppliers into our own-operations in UK/ROI. The revised Human Rights requirements focus on the areas of highest risk and include requiring key suppliers to engage with the Responsible Recruitment Toolkit as well as attending bi-annual meetings with the Responsible Sourcing Team to ensure that together we continue to strengthen and coordinate our approach to identifying and mitigating risks of modern slavery.' [Our approach to human rights (website), 27/05/2020: <a href="https://www.tescoplc.com">tescoplc.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• 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	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>• Not met: System to check if Actions are effective: The Company indicates that 'We have taken steps in the last six months, to refine how we measure the effectiveness of our Tesco UK due diligence approach and to move beyond a focus on the outcomes of ethical audits. This includes setting KPIs on each of the 4 areas of our strategy – forced labour, gender equality, sustainable livelihoods and workers representation. We are involving suppliers, NGOs and trade unions in the development of this framework, consulting with them on the development and monitoring of each area of work.' However, it is not clear whether Tesco UK refers only to activity in the UK or if it covers measures carried out at global corporate level. [Our approach to human rights (website), 27/05/2020: <a href="https://www.tescopl.com">tescopl.com</a>]</li> <li>• Met: Lessons learnt from checking effectiveness: The Company indicates: 'The collaborations we are part of provide another route for tracking the impact our work has on human rights. For example, within the Malawi 2020 project, we track the impact of the programme on farmers, who are predominantly women. For example, increases in yields were 15-20% higher for women trained in agricultural practices than untrained groups in 2018' (gender equality issue). [Our approach to human rights (website), 27/05/2020: <a href="https://www.tescopl.com">tescopl.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	0.5	<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: Comms plan re identifying risks: See indicator B.2.1</li> <li>• Met: Comms plan re assessing risks: See indicator B.2.2</li> <li>• Met: Comms plan re action plans for risks: See indicator B.2.3</li> <li>• Not met: Comms plan re reviewing action plans: In order to be awarded this indicator, the Company has to achieve a full score in B.2.4</li> <li>• Not met: Including AG 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> <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: The whistleblowing policy indicates that 'The Protector Line is a way for colleagues, suppliers and their staff to disclose information that relates to suspected wrongdoing or dangers at work relating to Tesco'. This channel explicitly includes human rights issues. For Tesco colleagues the channel 'will be managed by the Loss Prevention and Security team following the Protector Line Blueprint'. In addition to the information disclosed above, the code of conduct includes the email address and the telephone number for the different countries. [Whistleblowing policy, 12/06/2019: <a href="https://www.tescopl.com">tescopl.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Number grievances filed, addressed or resolved: The Company indicates in its Modern Slavery Statement: 'In the past 12 months through Protector Line, the Unseen Modern Slavery helpline, supplier visits and other channels, there have been 16 incidents with potential indicators of modern slavery in our supply chains.' However, no further evidence found, including the total number of human rights complaints, and how many of those were addressed or resolved. [Modern Slavery Statement 2019/20, 2020: <a href="https://www.tescopl.com">tescopl.com</a>]</li> <li>• Not met: Channel is available in all appropriate languages: The Company indicates that 'independent and confidential modern slavery helpline. Trained helpline advisors are able to support potential victims of modern slavery as well as offer a way for businesses and the general public to raise suspicions or concerns. Real-time translation is available in over 180 languages.' However, it is not clear whether the scope of this helpline goes beyond the UK. Also it seems to be limited to modern-slavery related issues. [Little Help Plan Report 2019/20, 2020: <a href="https://www.tescopl.com">tescopl.com</a>]</li> </ul>



Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Met: Opens own system to AG supplier workers: The Company's whistleblowing policy indicates that 'for suppliers and their staff, we are operating a separate dedicated global Supplier Protector Line service operated by an independent 3rd party'. The Company describes how the system works and the different ways to contact. [Whistleblowing policy, 12/06/2019: <a href="https://www.tescopl.com">tescopl.com</a>]</li> <li>• Met: Opens own system to AP supplier workers: See above</li> </ul>
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"> <li>• Met: Grievance mechanism for community: On its website, the Company indicates: 'All Tesco employees and workers in Tesco's first tier supply base have access to our confidential independently managed Protector Line. Workers in lower tiers and communities can also use the line and all concerns will be investigated, but it is not communicated directly to these workers and communities. Protector Line is promoted in the language relevant to the location of the site'. In addition, in its MSA 2020, it states: 'We continue to work in partnership with Unseen, who run the UK's independent and confidential modern slavery helpline. Trained helpline advisors are able to support potential victims of modern slavery as well as offer a way for businesses and the public to raise suspicions or concerns, complementing our own Protector Line. Real-time translation is available in over 180 languages. We expect our primary supplying sites in the UK, as well as our distribution and fulfilment centres, to promote the helpline, enabling us to continue to raise awareness of modern slavery.' However it is not clear if this additional channel is open to all stakeholders and communities at all places, particularly in high risk locations. Current evidence seems focused in the UK and in modern slavery-related issues. [Modern Slavery Statement 2019/20, 2020: <a href="https://www.tescopl.com">tescopl.com</a> &amp; Our approach to human rights (website), 27/05/2020: <a href="https://www.tescopl.com">tescopl.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Describes accessibility and local languages: 'Unseen' is available online and 'real-time translation is available in over 180 languages'. However, as indicated above, channel needs to be accessible for all audiences at all locations, and having a wider scope than modern-slavery related issues. The Protector Line is not communicated to lower tiers and communities and is available in the 'languages relevant to the location of the site'. [Modern Slavery Statement 2019/20, 2020: <a href="https://www.tescopl.com">tescopl.com</a> &amp; Our approach to human rights (website), 27/05/2020: <a href="https://www.tescopl.com">tescopl.com</a>]</li> <li>• Met: Expects AG supplier to have community grievance systems: The Company states in its 'Human rights requirements for food and grocery non food suppliers' document: 'To ensure possible grievances are addressed early and remediated appropriately, Tesco's expectation is that all suppliers establish or participate in effective operational-level grievance mechanisms. Further guidance on remediation and grievance mechanisms can be found in the guidance on the implementation of the UN Guiding Principles on Business and Human Rights'. [Human rights requirements for food and grocery non food suppliers, 01/10/2018: <a href="https://www.tescopl.com">tescopl.com</a>]</li> <li>• Not met: Expects AP supplier to have community grievance systems</li> <li>• Not met: AP supplier communities use global system: The Company reports on its website: 'We strongly encourage all our primary supplying sites in the UK as well as our distribution and fulfilment centres promote the helpline [Unseen Modern Slavery Helpline], enabling us to continue to raise awareness of modern slavery. We are also in the progress of rolling out Modern Slavery posters to community noticeboards in all our large stores across the UK. Our partnership not only supports the expansion of the helpline but, where indicators of modern slavery are identified at sites relevant to Tesco, the Unseen Business Portal enables us to collaborate with other members also to ensure resolution.' It also indicates: 'All Tesco employees and workers in Tesco's 'first tier' supply base have access to our confidential, independently managed Protector Line. Workers in lower tiers can also use the line and all concerns will be investigated, but it is not communicated directly to these workers. Protector Line is promoted in the relevant language'. However, it is not clear that external individuals or communities related to suppliers have access to the Company's own channel(s)/mechanism(s) to raise complaints or concerns about the Company's suppliers. [Our approach to human rights (website), 27/05/2020: <a href="https://www.tescopl.com">tescopl.com</a>]</li> </ul>
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"> <li>• Met: Describes how remedy has been provided: The Company indicates in its MSA 2020: 'In response to these findings, a comprehensive action plan was developed by Tesco Malaysia, Tesco Group Responsible Sourcing and external human rights experts including: [...] Full remediation including the repayment of</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>recruitment fees [...]. Report that 15 passports and 25-30 work permits were held by a supplier in Thailand. Following engagement with the site, all necessary documents were returned and a document retention policy and revised permit renewal process is now in place. There is also ongoing engagement with workers through the independent 'Issara' migrant worker helpline. [...] Reports that a number of workers had become undocumented as a result of a supplier in Thailand not managing work permit renewal processes effectively. This also left workers exposed to recruitment agents requesting unauthorised fees. Direct engagement with the supplier resulted in workers receiving the correct documentation, compensation and a review of HR processes and worker communication'. [Modern Slavery Statement 2019/20, 2020: <a href="https://www.tesco.com/tescoplcsustainability/modern-slavery-statement">tescoplc.com</a>]</p> <ul style="list-style-type: none"> <li>• Not met: Says how it would remedy key sector risks</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Changes introduced to stop repetition: As indicated above with respect a case of documentation that were held in a supplier in Thailand, the Company indicates: '[...] a document retention policy and revised permit renewal process is now in place. There is also ongoing engagement with workers through the independent 'Issara' migrant worker helpline.' In addition, on its website, the Company discloses information about its 'Sustainable Livelihood - supply chain strategy': 'Our approach within each of our priority supply chains is defined by three pillars: Improve. We are reviewing our purchasing practices to ensure they support producers to pay living wages to workers and for smallholder farmers to receive a fair income. This includes looking at how we can ensure quoted prices reflect the costs of sustainable and ethical production, and how our relationships with suppliers support positive changes. [...] Transform. By working with stakeholders, including unions, governments, NGOs and other businesses, we are identifying potential ways to measure wage gaps and increase wages and incomes. We will pilot solutions in collaboration with our partners and share learnings. [...] Advocate. We need to work with other stakeholders to ensure a level playing field across whole industries and to have long lasting impact. By convening and engaging others, including governments, we can find systemic solutions that will impact all workers or producers in a whole industry or country.' Moreover, the Company presents its Gender - supply chain strategy on its website. This strategy includes the following actions: 'ensure that suppliers have developed workplace policies to tackle harassment and violence and have implemented training and support programmes on sexual harassment and discrimination that include both men and women. Support the establishment of gender sensitive grievance mechanisms and ensure that women employees who come forward as victims of sexual harassment and discrimination are safeguarded'. [Modern Slavery Statement 2019/20, 2020: <a href="https://www.tesco.com/tescoplcsustainability/modern-slavery-statement">tescoplc.com</a> &amp; Sustainable Livelihood - supply chain strategy (website), 14/04/2020: <a href="https://www.tesco.com/tescoplcsustainability/modern-slavery-statement">tescoplc.com</a>]</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: Tesco to be investigated over North Korean forced labour in its supply chain</li> <li>• Area: Forced labour</li> <li>• Story: A UK media investigation linked Tesco to forced labour in its supply chain in Poland. A 2016 investigation by Channel 4's Dispatches programme identified the use of North Korean labourers at the Mularski tomato farm in Poland that supplies Tesco Poland. The programme described that North Korea obtains visas and work permits for workers in Poland and Malta, with workers allegedly being controlled and monitored by North Korean government officials while on-site. In particular, it is claimed by defectors from North Korea that as much as 90% of the wages generated are sent directly to the North Korean government. The Mularski farm states that the 62 workers are legally employed, treated fairly and paid correctly into individual bank accounts.</li> <li>• Sources: [The Telegraph, 31/05/2016: <a href="https://www.telegraph.co.uk">telegraph.co.uk</a>][NY Times, 31/12/2017: <a href="https://www.nytimes.com">nytimes.com</a>]</li> </ul>
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"> <li>• Met: Public response available: A spokesperson for Tesco told the programme: "It has long been a fundamental Tesco principle that we support workers' rights and require all of our suppliers to adhere to the highest standards for their workers. We have investigated the conditions at Mularski and have not seen or been provided with any evidence to suggest any workers at the site are being</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>mistreated in any way. We will continue to work closely with our supplier and expert organisations to ensure these standards are being upheld."</p> <p>Tesco says their UK stores do not sell tomatoes produced at Mularski.</p> <p>[Telegraph story on North Korean workers in Poland: <a href="https://www.telegraph.co.uk">telegraph.co.uk</a>]</p> <p>Score 2</p> <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	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Company policies address the general issues raised: The company states in their HR Statement: 'We are committed to upholding human rights and support in full the United Nations (UN) Universal Declaration of Human Rights and the International Labour Organization (ILO) Core Conventions on labour standards, working hours and health and safety for workers.' [Our approach to human rights (website), 27/05/2020: <a href="https://www.tescopl.com">tescopl.com</a>]</li> <li>• Met: Policies apply to the type of business relationships involved: The Company's 'Human rights requirements for food and grocery non food suppliers' document reads: 'Suppliers and sites are expected to read and implement the requirements, in addition to ensuring all sites are compliant with the ETI base code.' The Base Code of the ETI includes requirements in each of the ILO core areas. In relation to Freedom of Association and Collective bargaining, the ETI code also states that 'where the right of freedom of association and collective bargaining is restricted under law, the employer facilitates, and does not hinder, the development of parallel means for independent and free association and bargaining'. [Human rights requirements for food and grocery non food suppliers, 01/10/2018: <a href="https://www.tescopl.com">tescopl.com</a> &amp; ETI Base Code, 04/2018: <a href="https://ethicaltrade.org">https://ethicaltrade.org</a> Base Code %28English%29.pdf]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Policies address the specific rights in question: The Code (ETI Base Code) states that workers are not required to lodge their identity papers with their employees and are free to leave their employer after reasonable notice. The ETI base code is a requirement for suppliers. [ETI Base Code, 04/2018: <a href="https://ethicaltrade.org">https://ethicaltrade.org</a> Base Code %28English%29.pdf]</li> </ul>
E(1).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"> <li>• Not met: Engages with affected stakeholders</li> <li>• Not met: Encourages linked business to engage affected stakeholders</li> <li>• Not met: Provides remedies to affected stakeholders</li> <li>• Not met: Has reviewed management systems to prevent recurrence</li> </ul> <p>Score 2</p> <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</li> </ul>
E(2).0	Serious allegation No 2		<ul style="list-style-type: none"> <li>• Headline: Supply chain of Tesco, Asda, Waitrose, and others linked to forced labor in the UK</li> <li>• Area: Forced labour</li> <li>• Story: 7 July 2019, A report by The Times newspaper outlines the suffering of a group of Polish workers who were drawn to the UK by an English gang on promises of good wages, however when they arrived they were put to hard manual labour and allegedly only paid fifty pence per day. In addition to the long working hours, the group were forced to live in squalid conditions, consistent with situations of modern slavery. It's believed that more than 350 workers had been subjected to this treatment by the slavery ring. The article notes that many of the victims worked at Sandifields Farms, and claims that the larger firm that owns it supplies fruit and vegetables to a number of UK supermarkets. It recounts the experience of one worker "whose job was to heave 20kg crates of spring onions from the back of vehicles onto wooden pallets. From there, the spring onions would be taken to a storage building, where they would be wrapped in Tesco and Asda packaging". In response to the allegations a Tesco spokesman said "We have a zero tolerance approach to exploitation in our supply chain and have stringent standards to protect human rights and prevent exploitation. All our UK suppliers are required to undergo training to spot the signs of modern slavery and prevent it occurring and audit their labour providers to ensure they are GLAA compliant. Our supplier has notified us of this investigation."</li> <li>• Sources: [The Daily Mail - 07/07/2019: <a href="https://www.dailymail.co.uk">dailymail.co.uk</a>][The Times - 07/07/2019: <a href="https://www.thetimes.co.uk">thetimes.co.uk</a>][The Guardian - 05/07/2019: <a href="https://www.theguardian.com">theguardian.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
E(2).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"> <li>• Met: Public response available: In a statement a spokesperson for the company said "We have a zero tolerance approach to exploitation in our supply chain and have stringent standards to protect human rights and prevent exploitation. All our UK suppliers are required to undergo training to spot the signs of modern slavery and prevent it occurring and audit their labour providers to ensure they are GLAA compliant. Our supplier has notified us of this investigation." [Daily Mail allegation regarding forced labour: <a href="https://www.dailymail.co.uk">dailymail.co.uk</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Response goes into detail: The company's response doesn't provide sufficient detail.</li> </ul>
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"> <li>• Met: Company policies address the general issues raised: The company's 'Approach to Human Rights in Supply Chain' policy says "We are committed to upholding human rights and support in full the United Nations (UN) Universal Declaration of Human Rights and the International Labour Organization (ILO) Core Conventions on labour standards, working hours and health and safety for workers." [Our approach to human rights in our supply chain, 11/04/2019: <a href="https://www.tescoplc.com">tescoplc.com</a>]</li> <li>• Met: Policies apply to the type of business relationships involved: On its 'promoting Human Rights group position statement' in relation to its supply chain the company says "Our starting point is the Base Code of the ETI, which covers the health and safety of workers and prohibits forced labour, child labour and human trafficking. Upholding the Code is one of the requirements for our suppliers of doing business with Tesco. Our suppliers are required to communicate our requirements along their supply chain and to relevant stakeholders." [Human Rights Policy (website), 11/04/2019: <a href="https://www.tescoplc.com">tescoplc.com</a> &amp; ETI Base Code: <a href="https://www.ethicaltrade.org">ethicaltrade.org</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Policies address the specific rights in question: The company references the ETI base code as one of the requirements for suppliers to do business with Tesco. The ETI base code outlines a number of conditions in relation to requirements that Workers are not required to lodge deposits or their identity papers with their employer and are free to leave their employer after reasonable notice. [Human Rights Policy (website), 11/04/2019: <a href="https://www.tescoplc.com">tescoplc.com</a> &amp; ETI Base Code: <a href="https://www.ethicaltrade.org">ethicaltrade.org</a>]</li> </ul>
E(2).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"> <li>• Not met: Engages with affected stakeholders: In a statement the company said "We have a zero tolerance approach to exploitation in our supply chain and have stringent standards to protect human rights and prevent exploitation. All our UK suppliers are required to undergo training to spot the signs of modern slavery and prevent it occurring and audit their labour providers to ensure they are GLAA compliant. Our supplier has notified us of this investigation." However there is no further information as to whether the company has engaged with the affected stakeholders. [Response to Brzezinski slavery allegations, 30/07/2019: <a href="https://www.dailymail.co.uk">dailymail.co.uk</a>]</li> <li>• Not met: Encourages linked business to engage affected stakeholders: In a statement the company said "We have a zero tolerance approach to exploitation in our supply chain and have stringent standards to protect human rights and prevent exploitation. All our UK suppliers are required to undergo training to spot the signs of modern slavery and prevent it occurring and audit their labour providers to ensure they are GLAA compliant. Our supplier has notified us of this investigation." However there is no further information as to how the company has encouraged its linked business to engage with the affected stakeholders. [Response to Brzezinski slavery allegations, 30/07/2019: <a href="https://www.dailymail.co.uk">dailymail.co.uk</a>]</li> <li>• Not met: Provides remedies to affected stakeholders: Although the article notes that the victims are no longer in situations of bonded labour, there is no evidence that they have been provided with remedy for their experiences. [Response to Brzezinski slavery allegations, 30/07/2019: <a href="https://www.dailymail.co.uk">dailymail.co.uk</a>]</li> <li>• Not met: Has reviewed management systems to prevent recurrence: In a statement the company said "We have a zero tolerance approach to exploitation in our supply chain and have stringent standards to protect human rights and prevent exploitation. All our UK suppliers are required to undergo training to spot the signs of modern slavery and prevent it occurring and audit their labour providers to ensure they are GLAA compliant. Our supplier has notified us of this</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>investigation." However there is no further evidence of whether the company has reviewed its management systems. [Response to Brzezinski slavery allegations, 30/07/2019: <a href="http://dailymail.co.uk">dailymail.co.uk</a>]</p> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Remedies are satisfactory to the victims: Although the article notes that the victims are no longer in situations of bonded labour, there is no evidence that they have been provided with remedy for their experiences. [Response to Brzezinski slavery allegations, 30/07/2019: <a href="http://dailymail.co.uk">dailymail.co.uk</a>]</li> <li>• Not met: Has improved systems and engaged affected stakeholders: In a statement the company said "We have a zero tolerance approach to exploitation in our supply chain and have stringent standards to protect human rights and prevent exploitation. All our UK suppliers are required to undergo training to spot the signs of modern slavery and prevent it occurring and audit their labour providers to ensure they are GLAA compliant. Our supplier has notified us of this investigation." However there is no further information as to whether the company has improved its systems or engaged with the affected stakeholders. [Response to Brzezinski slavery allegations, 30/07/2019: <a href="http://dailymail.co.uk">dailymail.co.uk</a>]</li> </ul>
E(3).0	Serious allegation No 3		<ul style="list-style-type: none"> <li>• Headline: Tesco, Mothercare, and others criticized for supplying from a factory in Bangladesh that exploited women rights</li> <li>• Area: working hours, Discrimination and degrading treatment</li> <li>• Story: 20 January 2019, An investigation by the Guardian newspaper revealed poor working conditions present in a Bangladesh factory, where workers were producing 'Spice Girls' t-shirts to be sold in order to raise money for UK charity Comic Relief. The article outlines how the predominantly female workforce were forced to work 16 hour days in poor conditions and were regularly subject to verbal abuse and harassment by senior management, the women also claim to only be paid 35 pence per hour for their work. The factory where these women work is owned by Interstoff Apparels, which supplies UK supermarket Tesco. When approached by the Guardian, Tesco said it was investigating the matter.</li> <li>• Sources: [The Guardian - 21/01/2019: <a href="http://theguardian.com">theguardian.com</a>][The Guardian - 20/01/2019: <a href="http://theguardian.com">theguardian.com</a>]</li> </ul>
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"> <li>• Met: Public response available: The company doesn't provide a direct quote to the newspaper, however the Guardian article notes that "Tesco said it was investigating". [Guardian story about workers in Bangladesh: <a href="http://theguardian.com">theguardian.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Response goes into detail: The company's response doesn't provide sufficient detail.</li> </ul>
E(3).2	The Company has appropriate policies in place	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Company policies address the general issues raised: The company's 'Approach to Human Rights in Supply Chain' policy says "We are committed to upholding human rights and support in full the United Nations (UN) Universal Declaration of Human Rights and the International Labour Organization (ILO) Core Conventions on labour standards, working hours and health and safety for workers." [Human Rights in our supply chain, 05/2019: <a href="http://tescoplc.com">tescoplc.com</a>]</li> <li>• Met: Policies apply to the type of business relationships involved: On its 'promoting Human Rights group position statement' in relation to its supply chain the company says "Our starting point is the Base Code of the ETI, which covers the health and safety of workers and prohibits forced labour, child labour and human trafficking. Upholding the Code is one of the requirements for our suppliers of doing business with Tesco. Our suppliers are required to communicate our requirements along their supply chain and to relevant stakeholders." [Human Rights Policy (website), 11/04/2019: <a href="http://tescoplc.com">tescoplc.com</a> &amp; ETI Base Code: <a href="http://ethicaltrade.org">ethicaltrade.org</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Policies address the specific rights in question: The company references the ETI base code as one of the requirements for suppliers to do business with Tesco. The ETI base code outlines a number of conditions in relation to working hours policies respecting international standards and national laws. [ETI Base Code: <a href="http://ethicaltrade.org">ethicaltrade.org</a> &amp; Human Rights Policy (website), 11/04/2019: <a href="http://tescoplc.com">tescoplc.com</a>]</li> </ul>
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"> <li>• Not met: Engages with affected stakeholders: The company doesn't provide a direct quote to the newspaper, however the Guardian article notes that "Tesco said it was investigating". However there is no evidence that the company has engaged with affected stakeholders.</li> </ul>



Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Not met: Encourages linked business to engage affected stakeholders: The company doesn't provide a direct quote to the newspaper, however the Guardian article notes that "Tesco said it was investigating". However there is no evidence that the company has encouraged its linked business, Interstoff Apparels, to engage with affected stakeholders.</li> <li>• Not met: Provides remedies to affected stakeholders: There is no evidence that remedy has been provided to the affected stakeholders.</li> <li>• Not met: Has reviewed management systems to prevent recurrence: There is no evidence that the company has reviewed its management systems in light of this allegation.</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Remedies are satisfactory to the victims: There is no evidence that remedy has been provided to the stakeholders, nor that it has been considered satisfactory.</li> <li>• Not met: Has improved systems and engaged affected stakeholders: There is no evidence that the company has improved its management systems in light of this allegation, nor that it has engaged with the affected stakeholders.</li> </ul>
E(4).0	Serious allegation No 4		<ul style="list-style-type: none"> <li>• Headline: NHS condom supplier Karex criticized over forced labor and poor employment conditions in Malaysia</li> <li>• Area: Forced labour; Bonded labour</li> <li>• Story: 23 January 2019, An investigation by The Telegraph uncovered situations of bonded labour and poor working conditions at the Karex Innolatex factory in Malaysia that produces condoms. The article recounts stories from a number of employees, who claim to live in cramped and undignified conditions, with up to 12 in a room in damp and unhygienic dormitories. One worker said he earned only 190 pounds per month despite working full time hours and remains indebted to a creditor, who lent him the £810 fee demanded by Nepali recruiters to secure the post. He is also unable to leave the job, for fear of incurring a penalty of three-months salary for breaking his contract early. The Telegraph notes that it interviewed 22 Nepali and Bangladeshi employees of Karex's condom and catheter factories in Pontian, Senai and Port Klang and that all told similar stories. The article states that the Karex Innolatex factory supplies condoms to a number of highstreet brands, including Tesco.</li> <li>• Sources: [The Telegraph - 23/01/2019: <a href="https://www.telegraph.co.uk">telegraph.co.uk</a>] [BHRR - 24/01/2019: <a href="https://business-humanrights.org">business-humanrights.org</a>]</li> </ul>
E(4).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"> <li>• Met: Public response available: In its response to the article, Tesco said it had also visited the factory last week and, after speaking to workers, had identified "a number of serious concerns". It added: "We immediately suspended Tesco production at the site pending further investigation... Everyone who works for, or with Tesco, has a right to be fairly treated." [Response to Karex allegation, 23/01/2019: <a href="https://www.telegraph.co.uk">telegraph.co.uk</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Response goes into detail: The company's response does not provide sufficient detail. [Response to Karex allegation, 23/01/2019: <a href="https://www.telegraph.co.uk">telegraph.co.uk</a>]</li> </ul>
E(4).2	The Company has appropriate policies in place	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Company policies address the general issues raised: In its Group Position Statement on human rights the company says "We are committed to upholding human rights and support in full the United Nations (UN) Universal Declaration of Human Rights and the International Labour Organization (ILO) Core Conventions on labour standards, working hours and health and safety for workers...Our starting point is the Base Code of the ETI, which covers the health and safety of workers and prohibits forced labour, child labour and human trafficking. Upholding the Code is one of the requirements for our suppliers of doing business with Tesco. Our suppliers are required to communicate our requirements along their supply chain and to relevant stakeholders." [Our approach to human rights in our supply chain, 11/04/2019: <a href="https://www.tescopl.com">tescopl.com</a> &amp; Human Rights Policy (website), 11/04/2019: <a href="https://www.tescopl.com">tescopl.com</a>]</li> <li>• Met: Policies apply to the type of business relationships involved: In its Group Position Statement on human rights the company says "Our starting point is the Base Code of the ETI, which covers the health and safety of workers and prohibits forced labour, child labour and human trafficking. Upholding the Code is one of the requirements for our suppliers of doing business with Tesco. Our suppliers are required to communicate our requirements along their supply chain and to relevant stakeholders." [Our approach to human rights in our supply chain, 11/04/2019: <a href="https://www.tescopl.com">tescopl.com</a> &amp; ETI Base Code: <a href="https://www.ethicaltrade.org">ethicaltrade.org</a>]</li> </ul>



Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> <li>Met: Policies address the specific rights in question: The Company takes part in the Ethical Trade Initiative. The ETI Base Code, which is a requirement for all suppliers, states 'Employment is freely chosen 1.1 There is no forced, bonded or involuntary prison labour. 1.2 Workers are not required to lodge "deposits" or their identity papers with their employer and are free to leave their employer after reasonable notice.' [Our approach to human rights in our supply chain, 11/04/2019: <a href="https://tescoplc.com">tescoplc.com</a>]</li> </ul>
E(4).3	The Company has taken appropriate action	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>Met: Engages with affected stakeholders: In response to the allegation the company states that 'it had also visited the factory last week and, after speaking to workers, had identified "a number of serious concerns". It added: "We immediately suspended Tesco production at the site pending further investigation... Everyone who works for, or with Tesco, has a right to be fairly treated.' [Response to Karex allegation, 23/01/2019: <a href="https://telegraph.co.uk">telegraph.co.uk</a>]</li> <li>Not met: Provides remedies to affected stakeholders: There is no evidence to demonstrate that remedy has been provided to the affected stakeholders involved. [Response to Karex allegation, 23/01/2019: <a href="https://telegraph.co.uk">telegraph.co.uk</a>]</li> <li>Not met: Has reviewed management systems to prevent recurrence: In response to the allegation the company states that "'We immediately suspended Tesco production at the site pending further investigation... Everyone who works for, or with Tesco, has a right to be fairly treated.'" However there is no further evidence of how the company has reviewed its management systems in light of the allegation [Response to Karex allegation, 23/01/2019: <a href="https://telegraph.co.uk">telegraph.co.uk</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>Not met: Remedies are satisfactory to the victims: There is no evidence to demonstrate that remedy has been provided to the affected stakeholders. [Response to Karex allegation, 23/01/2019: <a href="https://telegraph.co.uk">telegraph.co.uk</a>]</li> <li>Not met: Has improved systems and engaged affected stakeholders: In response to the allegation the company states that 'it had also visited the factory last week and, after speaking to workers, had identified "a number of serious concerns", demonstrating that it has engaged with affected stakeholders, however it doesn't provide evidence of how it has improved its systems in light of the allegation. [Response to Karex allegation, 23/01/2019: <a href="https://telegraph.co.uk">telegraph.co.uk</a>]</li> </ul>
E(5).0	Serious allegation No 5		<ul style="list-style-type: none"> <li>Headline: Tesco withdraws Christmas cards from sale after forced labour claims</li> <li>Area: Forced Labour (prison)</li> <li>Story: Tesco suspended production in a Chinese factory after a young girl discovered a note in a Christmas card stating: 'We are foreign prisoners in Shanghai Qinqpu prison China. Forced to work against our will. Please help us and notify human rights organization.' It also asked the reader to contact Peter Humphrey, a journalist who had spent 23 months in the prison. Former inmates claim that for at least two years they were forced to choose designs, package the cards, seal the boxes and put them into shipping cartons for the Company. Humphrey claims to have seen other brand names as well.</li> <li>Sources: [The Guardian - 22/12/2019: <a href="https://theguardian.com">theguardian.com</a>]</li> </ul>
E(5).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"> <li>Met: Public response available: The Company released a statement regarding this allegation: 'We abhor the use of prison labour and would never allow it in our supply chain. We were shocked by these allegations and immediately suspended the factory where these cards are produced and launched an investigation. We have also withdrawn these cards from sale whilst we investigate.' [Christmas card supply chain press release, 22/12/2019: <a href="https://tescoplc.com">tescoplc.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>Not met: Response goes into detail</li> </ul>
E(5).2	The Company has appropriate policies in place	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>Met: Company policies address the general issues raised: The Company is committed to the ILO Core and is a member of the UN Global Compact. [Promoting Human Rights at Tesco (Position statement - web), 11/04/2019: <a href="https://tescoplc.com">https://tescoplc.com</a>]</li> <li>Met: Policies apply to the type of business relationships involved: The Company indicates in its human rights statement that it is committed to eradicating forced labour from its supply chain. [Promoting Human Rights at Tesco (Position statement - web), 11/04/2019: <a href="https://tescoplc.com">https://tescoplc.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			Score 2 • Met: Policies address the specific rights in question: The Company takes part in the Ethical Trade Initiative. The ETI Base Code, which is a requirement for all suppliers, states 'Employment is freely chosen 1.1 There is no forced, bonded or involuntary prison labour. 1.2 Workers are not required to lodge "deposits" or their identity papers with their employer and are free to leave their employer after reasonable notice.' [ETI Base Code: <a href="https://www.ethicaltrade.org">ethicaltrade.org</a> ]
E(5).3	The Company has taken appropriate action	0	The individual elements of the assessment are met or not as follows: Score 1 • Not met: Engages with affected stakeholders • Not met: Encourages linked business to engage affected stakeholders • Not met: Provides remedies to affected stakeholders • Not met: Has reviewed management systems to prevent recurrence • Not met: Denies allegations, but has engaged affected stakeholders • Not met: Denies allegations, but reviewed systems to prevent such impacts Score 2 • Not met: Remedies are satisfactory to the victims • Not met: Has improved systems and engaged affected stakeholders • Not met: Denies allegations, but implements review recommendations • Not met: Denies allegations, and ensures systems prevent such impacts

## 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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