

Company Name Tokyo Electron
Industry ICT (Own operations and Supply Chain)
UNGP Core Score (*) 8.5 out of 26

Score	Out of	For indicators
Governance and Policy Commitments		
1	2	A.1.1 Commitment to respect human rights
0.5	2	A.1.2 Commitment to respect the human rights of workers
1	2	A.1.4 Commitment to engage with stakeholders
0	2	A.1.5 Commitment to remedy
Embedding respect and Human Rights Due Diligence		
Embedding respect		
1.5	2	B.1.1 Embedding - Responsibility and resources for day-to-day human rights functions
Human Rights Due Diligence (HRDD)		
1.5	2	B.2.1 HRDD - Identifying: Processes and triggers for identifying human rights risks and impacts
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
0.5	2	B.2.5 HRDD - Reporting: Accounting for how human rights impacts are addressed
Remedies and Grievance Mechanisms		
1.5	2	C.1 Grievance channels/mechanisms to receive complaints or concerns from workers
1	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
8.5	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	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: General HRs commitment: The Company states that 'We respect human rights of all directly hired individuals including contract workers, part-timers and agency workers ("employees") of Tokyo Electron Limited and its consolidated subsidiaries ("Tokyo Electron Group"); as well as employees of business partners of Tokyo Electron Group, especially those within our supply chain. Furthermore, we respect human rights of the customers who may be affected by safety of products and services manufactured and/or provided by Tokyo Electron Group'. [Human Rights Policy, 29/09/2017: tel.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: UNGPs: The Company indicates that 'We have committed to respect human rights in line with the United Nations Guiding Principles on Business and Human Rights'. However a commitment to respect the HR- in line- with UN Guiding Principles is not considered a formal commitment following CHRB wording criteria. [Human Rights Policy, 29/09/2017: tel.com] • Not met: OECD
A.1.2	Commitment to respect the human rights of workers	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: UNGC principles 3-6: The Company indicates that became a signatory to the UN Global Compact in 2013, it indicates in its Sustainability Report: 'TEL is a corporate member of the United Nations Global Compact and the Responsible Business Alliance (RBA), both global CSR initiatives, whereby the company strives to build a sustainable management foundation from a global perspective.' [Human Rights Policy, 29/09/2017: tel.com & Sustainability Report 2020, 07/2020: tel.com] • Not met: Explicitly list ALL four ILO for ICT suppliers: The Company requires to suppliers compliance with applicable laws, social norms and the RBA Code of Conduct (the Company provides the RBA code of conduct document as the requirement for suppliers). The RBA code of conduct contains commitments non-discrimination, child labour, forced labour. In relation to freedom of association and collective bargaining the RBA Code states that 'In conformance with local law, participants shall respect the right of all workers to form and join trade unions of their own choosing, to bargain collectively and to engage in peaceful assembly as well as respect the right of workers to refrain from such activities'. However, it is not clear whether the Company requires to respect those rights in all contexts, as it indicates 'in conformance with local law'. In these cases (companies referring to local laws in freedom of association and collective bargaining), companies are expected to require alternative mechanisms or equivalent workers bodies where the right to freedom of association and collective bargaining is restricted under law. [Procurement Management, N/A: tel.com & RBA Code of Conduct 6.0, N/A: responsiblebusiness.org] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Explicit commitment to All four ILO Core: The Company is committed to each of 'Freedom, equality & Non-Discrimination', 'freely chosen employment: We have zero tolerance for child labor, forced labor, bonded labor and human trafficking'; 'Freedom of Association: We create opportunities for open-minded dialogue with employees. We respect the right of employees to freely associate (form and join groups) and to voluntarily discuss and negotiate their relations with their employers as well as respect the right of the employees to refrain from such activities'. However, no evidence found of a formal commitment to respect the right to collective bargaining. [Human Rights Policy, 29/09/2017: tel.com] • Met: Respect H&S of workers: The Company indicates that 'Product Safety & Workplace Health and Safety: We address health and safety through taking steps to ensure that our products and services do not threaten the life and health of the

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>people who manufacture, provide or use them'. [Human Rights Policy, 29/09/2017: tel.com]</p> <ul style="list-style-type: none"> • Met: H&S applies to ICT suppliers: The Company indicates that 'We request that suppliers respect fundamental human rights, also prepare independent standards, and provide safe and healthy work environments'. [Procurement Management, N/A: tel.com] • Not met: working hours for workers: The Company's human rights policy states that 'We respect the right of employees to live a healthy life. We conduct our business in compliance with all applicable laws and regulations relating to working hours, breaks, holidays and vacation days'. However, no evidence found of references to standard weekly hours or the Company explicitly committing to respect ILO conventions on working hours. [Human Rights Policy, 29/09/2017: tel.com] • Not met: Working hours for ICT suppliers: The Company requires to suppliers compliance with applicable laws, social norms and the RBA Code of Conduct (the Company provides the RBA code of conduct document as the requirement for suppliers). In relation to working hours, it states requires the following: 'Working hours are not to exceed the maximum set by local law. Further, a workweek should not be more than 60 hours per week, including overtime, except in emergency or unusual situations. Workers shall be allowed at least one day off every seven days'. However, no details found regarding requirements for suppliers to commit to a maximum of 48 hours for standard weekly hours or to respect international standards on working hours [Sustainability Report 2020, 07/2020: tel.com & RBA Code of Conduct 6.0, N/A: responsiblebusiness.org]
A.1.4	Commitment to engage with stakeholders	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Regular stakeholder engagement: In its Sustainability report, the Company discloses stakeholders including employees, suppliers and communities. It discloses key opinions and requests of each group. Also discloses specific engagement including conference for women engineers within the Company, and global engagement survey with employees. The Company reports outcomes of both examples. In addition, in the section 'Stakeholder engagement' from its Sustainability Report 2020, the Company indicates: '[...] continuing on from last year, we have defined our material issues as people and workplaces, which are important as a resource for creating value, and management foundation, which concerns corporate governance, compliance, the environment, human rights, and other issues, [...], which are items identified for enhancement in the medium-term management plan'. [Tokyo Electron Sustainability Report 2019, 18/11/2019: tel.com & Sustainability Report 2020, 07/2020: tel.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Commits to engage stakeholders in design: The Company states: 'The CSR operations of Tokyo Electron (TEL) are initiatives that realize TEL's Corporate Philosophy. We pursue sustainable operations from the viewpoints of corporate governance, legal and regulatory compliance, and business ethics while creating new value through our products and services. [...] We will continue to pursue CSR activities to build stakeholder trust, improve corporate value and, by doing so, promote the growth of a sustainable and dream-inspiring society'. However, no evidence found of a formal commitment to stakeholders engagement in order to develop Human Rights approach. [TEL's CSR, N/A: tel.com] • Not met: Regular stakeholder design engagement
A.1.5	Commitment to remedy	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Commits to remedy: The Company indicates in its Sustainability Report: 'In the event of a report or request for advice, the TEL group undertakes an investigation in accordance with internal regulations. If, as a result, a compliance violation is found, a disciplinary action is imposed in accordance with the Rules of Employment. Preventive measures and corrective measures, such as improvements to the workplace environment, are also implemented as necessary'. In addition, on its website Management Foundation, the Company states that it has 'constructed a framework for impact assessment and remediation, and is striving to establish an effective business-level grievance mechanism. To date, the company has established hotlines in Japan and overseas for employees and suppliers, and it continues to develop initiatives for grievance mechanism in-house and in the supply chain.' However, 'strive for' remediation and 'striving to establish' are not considered a formal commitment to remedy according CHRB wording criteria. This indicator looks for a formal statement of commitment to remedy adverse impacts that the Company has caused or contributed to. [Sustainability Report 2020, 07/2020: tel.com & Management Foundation, N/A: tel.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			Score 2 <ul style="list-style-type: none"> • Not met: Not obstructing access to other remedies • Not met: Collaborating with other remedy initiatives • Not met: Work with ICT suppliers to remedy impacts

Embedding Respect and Human Rights Due Diligence

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.1	Responsibility and resources for day-to-day human rights functions	1.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Commits to ILO core conventions: See indicator A.1.2. The Company is signatory to the UNGC. • Met: Senior responsibility for HR: The Company reports: 'The CSR Management Council, the highest decision-making body regarding CSR, conducts discussions regarding the policy for the entire group, and important projects. Based on this, the CSR Global Committee discusses, that progress management regarding activities for achieving CSR targets along with the promotion of global projects, and shares best practices. At the CSR Monthly Meeting, information on activities is shared with representatives from each division, and collaborative systems are built to tackle cross-division themes. We are also working to strengthen our CSR structure by appointing officers in each division across the company to be in charge of understanding the CSR policy and goals and promoting CSR'. In addition, according to its website, Tatsuya Nagakubo is the Deputy General Manager, Global Business Platform Division (Human Resources, General Affairs, CSR, Branding, Legal, Compliance) Human Resources, General Affairs, CSR, Branding Division Legal, Compliance Division, Chairman of Ethics Committee. CSR covers human rights. [Sustainability Report 2020, 07/2020: tel.com] Score 2 <ul style="list-style-type: none"> • Met: Day-to-day responsibility: As indicated above, at the CSR Monthly Meeting, information on activities is shared with representatives from each division, and collaborative systems are built to tackle cross-division themes. We are also working to strengthen our CSR structure by appointing officers in each division across the company to be in charge of understanding the CSR policy and goals and promoting CSR'. In its Sustainability Report, it indicates: 'In addition to establishing the Code of Ethics as common and minimum standards of conduct by which all executives and employees should abide, we have also established a Business Ethics Committee for the purpose of promoting and raising awareness of compliance and corporate ethics more effectively within the TEL group'. [Tokyo Electron Corporate Governance Guidelines, 27/06/2019 & Sustainability Report 2020, 07/2020: tel.com] • Not met: Day-to-day responsibility for ICT in supply chain: The Company states that it conducts annual surveys of its suppliers related to Human Rights. It also reports that it 'conducted due diligence on human rights, conducted human rights risk surveys, and identified and assessed impacts. As part of the surveys, we utilized a self-assessment questionnaire (SAQ) for internal use based on the RBA Code of Conduct, and a CSR survey for suppliers of materials, staffing, and logistics, to understand the current situation throughout the value chain. We are using the results of these surveys to identify and assess impacts, and to clarify and implement corrective action.' However, no evidence found of a description by the Company of how day-to-day responsibility for managing human rights issues with its suppliers is allocated (including which teams/departments/units are responsible). [Supply Chain Management, N/A: tel.com & Sustainability Report 2020, 07/2020: tel.com]
B.2.1	Identifying: Processes and triggers for identifying human rights risks and impacts	1.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Identifying risks in own operations: The Company reports in its Sustainability Report: 'In fiscal year 2020, we also conducted due diligence on human rights, conducted human rights risk surveys, and identified and assessed impacts. As part of the surveys, we utilized a self-assessment questionnaire (SAQ) for internal use based on the RBA Code of Conduct, and a CSR survey for suppliers of materials, staffing, and logistics, to understand the current situation throughout the value chain. We are using the results of these surveys to identify and assess impacts'. [Sustainability Report 2020, 07/2020: tel.com] • Met: Identifying risks in ICT suppliers: As previous indicated, the Company conducts a two surveys, SAQ questionnaire based on RBA code, and a CSR survey 'to understand the current situation throughout the value chain'. It clarifies that 'we are using the results of these surveys to identify and assess impacts'. [Sustainability Report 2020, 07/2020: tel.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> • Met: Ongoing global risk identification: As indicated, the the process takes place in 2020. [Sustainability Report 2020, 07/2020: tel.com] • Not met: In consultation with stakeholders: Although the Company engages with different stakeholders, for example to identify material issues, no evidence found of engagement with affected stakeholders specifically for identifying human rights risks. [Sustainability Report 2020, 07/2020: tel.com] • Not met: In consultation with HR experts • Not met: Triggered by new circumstances
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"> • Not met: Salient risk assessment (and context): The Company indicates in its Sustainability Report: 'In order to promote more effective risk management, TEL carries out enterprise risk management through a body established within the General Affairs Department at its headquarters. This body works with the respective departments responsible for each operation to identify a wide range of risks arising in corporate activities (such as compliance risk, human resource and labor risk, and business continuity risk). It then classifies risks with high impact and probability as key risks within the TEL group.' However, this is related to its general Risk Management system, and not to a due diligence process aimed to identify and assess salient human rights issues. In addition, it reports: 'In fiscal year 2020, we also conducted due diligence on human rights, conducted human rights risk surveys, and identified and assessed impacts. As part of the surveys, we utilized a self-assessment questionnaire (SAQ) for internal use based on the RBA Code of Conduct, and a CSR survey for suppliers of materials, staffing, and logistics, to understand the current situation throughout the value chain. We are using the results of these surveys to identify and assess impacts, and to clarify and implement corrective action.' However, no further information found, including how social, geographical, economic or other factors were taken into account in saliency determination. [Sustainability Report 2020, 07/2020: tel.com] • Not met: Public disclosure of salient risks: The Company states: 'TEL has ascertained the social and business environment, considered the risks and opportunities, and put in order the opinions and requests of all stakeholders. We have deliberated material issues from the perspectives of their importance to both the building of a sustainable society and importance to the business to lead to increasing TEL's corporate value.' Additionally, it discloses a list of what it considers to be its material risks. However, the indicator requires a disclosure of the Company's salient human rights risks as a consequence of an assessment process. [Identifying Material Issues, N/A: tel.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met
B.2.3	Integrating and Acting: Integrating assessment findings internally and taking appropriate action	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Action Plans to mitigate risks: The Company indicates: 'In order to promote more effective risk management, TEL carries out enterprise risk management through a body established within the General Affairs Department at its headquarters. This body works with the respective departments responsible for each operation to identify a wide range of risks arising in corporate activities (such as compliance risk, human resource and labor risk, and business continuity risk). It then classifies risks with high impact and probability as key risks within the TEL group. The body also formulates and executes measures to minimize these key risks, monitors the effect of said measures, works to understand the status of risk control, and implements the PDCA cycle for risk management.' However, this is related to its general Risk Management system, and not to a due diligence process focused on specifically mitigating salient human rights issues. In addition, it reports: 'In fiscal year 2020, we also conducted due diligence on human rights, conducted human rights risk surveys, and identified and assessed impacts. As part of the surveys, we utilized a self-assessment questionnaire (SAQ) for internal use based on the RBA Code of Conduct, and a CSR survey for suppliers of materials, staffing, and logistics, to understand the current situation throughout the value chain. We are using the results of these surveys to identify and assess impacts, and to clarify and implement corrective action'. However, no further information found, including description of a system of Action Plans put in place to face salient human rights issues identified and assessed. [Sustainability Report 2020, 07/2020: tel.com] • Not met: Including in ICT supply chain

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not met: Example of Actions decided: The Company also reports: 'In March 2020, we enhanced the internal reporting system, and renamed TEL group Ethics & Compliance Hotline—a global common point of contact that uses a third-party system—thereby ensuring a greater level of confidentiality and anonymity. In the event of a report or request for advice, the TEL group undertakes an investigation in accordance with internal regulations.' It also discloses information about other initiatives related to monitoring supply chain CSR activities. However, this indicator looks for specific broad action plans to mitigate a specific salient issue. [Sustainability Report 2020, 07/2020: tel.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met
B.2.4	Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: System to check if Actions are effective: No evidence found in any of the two sources provided in the Company's feedback for the system(s) for tracking the actions taken in response to the salient human rights risks and impacts assessed and for evaluating whether the actions have been effective or have missed key issues or not produced the desired results. [Sustainability Report 2020, 07/2020: tel.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Lessons learnt from checking effectiveness • Not met: Both requirement under score 1 met
B.2.5	Communicating : Accounting for how human rights impacts are addressed	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Comms plan re identifying risks: See indicator B.2.1. The Company carries out a global risk identification and assessment process that includes both its own operations and business partners, and describes at least some features of the process. • Not met: Comms plan re assessing risks: In order to be awarded this indicator, the Company has to achieve a full score in B.2.2 • Not met: Comms plan re action plans for risks: In order to be awarded this indicator, the Company has to achieve a full score in B.2.3 • Not met: Comms plan re reviewing action plans: In order to be awarded this indicator, the Company has to achieve a full score in B.2.4 • Not met: Including ICT suppliers: 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 <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Responding to affected stakeholders concerns: The Company has provided comments to CHRB regarding this indicator. However, evidence was not material. • Not met: Ensuring affected stakeholders can access communications

Remedies and Grievance Mechanisms

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.1	Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Channel accessible to all workers: On its website Management Foundation, the Company states: 'As a means for employees to provide information and seek redress outside the chain of command about behavior that is, or may be, in violation of laws, regulations, or corporate ethics, we have established internal reporting mechanisms that ensure confidentiality, anonymity, and the prohibition of retribution. Apart from an internal point of contact that can also be accessed by suppliers, our reporting mechanisms include an external point of contact at a law firm that can be contacted directly. In March 2020, we enhanced the internal reporting system, and renamed TEL group Ethics & Compliance Hotline—a global common point of contact that uses a third-party system—thereby ensuring a greater level of confidentiality and anonymity. This hotline can be accessed via phone or a dedicated website 24 hours a day, 365 days a year, and accommodates all languages used by employees'. [Management Foundation, N/A: tel.com & Sustainability Report 2020, 07/2020: tel.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> • Not met: Number grievances filed, addressed or resolved: The Company indicates: 'In fiscal year 2020, a total of 64 cases were received via internal reporting mechanisms (excluding overseas subsidiaries), primarily concerning harassment, attendance management, and work environment. Among these, there were no reports or cases of non-compliance with laws, regulations, or the Code of Ethics that could have had a material impact on the TEL group's business or local communities.' However, it is not clear the total (Company-wide) number of reports were related to human rights issues, and how many were addressed or resolved during the year. [Sustainability Report 2020, 07/2020: tel.com] • Met: Channel is available in all appropriate languages: The Company states: 'This hotline can be accessed via phone or a dedicated website 24 hours a day, 365 days a year, and accommodates all languages used by employees'. [Sustainability Report 2020, 07/2020: tel.com] • Met: Opens own system to ICT supplier workers: In addition to hotline for employees, the Company indicates that 'we have established an external contact point for employees and another contact point specifically for suppliers and third parties. Each overseas location has its own internal reporting hotline'. [Tokyo Electron Sustainability Report 2019, 18/11/2019: tel.com]
C.2	Grievance channel(s)/mechanism(s) to receive complaints or concerns from external individuals and communities	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Grievance mechanism for community: The Company has 'a "Supplier Hotline" for whistleblowing with the aim of early detection and the prevention of compliance issues that violate/breach the following: [...], Tokyo Electron Group Code of Ethics, [...]' The Code covers human rights. In addition, it has a general sites for inquiries that can be used for complains and concerns from external stakeholders. It also indicates that . Apart from an internal point of contact that can also be accessed by suppliers, our reporting mechanisms include an external point of contact at a law firm that can be contacted directly. In March 2020, we enhanced the internal reporting system, and renamed TEL group Ethics & Compliance Hotline—a global common point of contact that uses a third-party system—thereby ensuring a greater level of confidentiality and anonymity [Supplier Hotline, N/A: secure.tel.com & Contact us, N/A: tel.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Describes accessibility and local languages: The Supplier Hotline is available in 15 languages. However, it is not clear whether the general site open for all external stakeholders is also available in multiple languages. The Company provided comments to CHRB regarding this indicator. However, this document or its content has not been found in publicly available sources. [Supplier Hotline, N/A: secure.tel.com & Contact us, N/A: tel.com] • Not met: Expects ICT supplier to have community grievance systems • Not met: ICT supplier communities use global system: The Company allows external third parties to file complaints, however, it seems that is restricted to report in relation to the Company alone, and not about its business relationships: 'If you discover any behavior that violates/breaches or could violate/breach compliance in our group's business activities, either by a director, an officer or an employee, please contact the hotline shown below.' [Supplier Hotline, N/A: secure.tel.com]
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"> • Not met: Describes how remedy has been provided: The Company indicates they 'will strive for the prevention, mitigation and remediation of, and avoidance of contributing to, adverse human rights impacts if they exist either directly or indirectly through our own activities and those activities associated with our business relationships'. Although the Company indicates in its Sustainability Report that it is 'expanding human rights due diligence (impact assessment and remediation) and grievance processes' in order to put in place corrective and remediation measures, no evidence has been found of a description of the approach the Company has taken or would take when providing remedy to victims for adverse human rights that it has caused or contributed to. [Human Rights Policy, 29/09/2017: tel.com & Sustainability Report 2020, 07/2020: tel.com] • Not met: Says how it would remedy key sector risks <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Changes introduced to stop repetition • Not met: Approach to learning from incident to prevent future impacts • Not met: Evaluation of the channel/mechanism

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
E(1).0	Serious allegation No 1		No allegations meeting the CHRB severity threshold were found.

Disclaimer

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

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

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As WBA, we want to emphasise that the results will always be a proxy for good human rights management, and not an absolute measure of performance. This is because there are no fundamental units of measurement for human rights. Human rights assessments are therefore necessarily more subjective than objective. The Benchmark also captures only a snap shot in time. We therefore want to encourage companies, investors, civil society and governments to look at the broad performance bands that companies are ranked within rather than their precise score because, as with all measurements, there is a reasonably wide margin of error possible in interpretation. We also want to encourage a greater analytical focus on how scores improve over time rather than upon how a company compares to other companies in the same industry today. The spirit of the exercise is to promote continual improvement via an open assessment process and a common understanding of the importance of the UN Guiding Principles on Business and Human Rights.

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