

**Company Name** UltraTech Cement  
**Industry** Extractive  
**UNGP Core Score (\*)** 3.5 out of 26

Score	Out of	For indicators
<b>Governance and Policy Commitments</b>		
1	2	A.1.1 Commitment to respect human rights
0.5	2	A.1.2 Commitment to respect the human rights of workers
1	2	A.1.4 Commitment to engage with stakeholders
0	2	A.1.5 Commitment to remedy
<b>Embedding respect and Human Rights Due Diligence</b>		
Embedding respect		
0	2	B.1.1 Embedding - Responsibility and resources for day-to-day human rights functions
Human Rights Due Diligence (HRDD)		
0.5	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	2	B.2.5 HRDD - Reporting: Accounting for how human rights impacts are addressed
<b>Remedies and Grievance Mechanisms</b>		
0.5	2	C.1 Grievance channels/mechanisms to receive complaints or concerns from workers
0	2	C.2 Grievance channels/mechanisms to receive complaints or concerns from external individuals and communities
0	2	C.7 Remedying adverse impacts and incorporating lessons learned
<b>3.5</b>	<b>26</b>	

(\*) Instead of the full list of indicators in the 2020 CHRB Methodology, this year's assessment uses the CHRB Core UNGP Indicators. These are 13 non-industry specific indicators that focus on three key areas of the UNGPs: high level commitments, human rights due diligence and access to remedy.

The 13 indicators selected from the full CHRB Methodology are scored on a simple unweighted basis, with a maximum of 2 points for each indicator for a maximum total of 26 points.

In addition, allegations of severe human rights impacts (Measurement Theme E) were also assessed but do not impact overall final scores

Please note that the "Not met" labels in the Explanation boxes below do not necessarily mean that the company does not meet the requirements as they are described in the bullet point short text. Rather, it means that the analysts could not find information *in public sources* that met the requirements *as described in full* in the CHRB 2020 Methodology document. For example, a "Not met" under "General HRs Commitment", which is the first bullet point for indicator A.1.1, does not necessarily mean that the company does not have a general commitment to human rights. Rather, it means that the CHRB could not identify a public statement of policy in which the company commits to respecting human rights.

## Detailed assessment

### Governance and Policies

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1.1	Commitment to respect human rights	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: General HRs commitment: The Company states that 'The Group Companies are committed to respecting the human rights of our workforce, communities and those affected by our operations wherever we do business (including our contractors and suppliers) in line with internationally recognised frameworks including the Social Accountability 8000 International Standard and its associated international instruments.' [Human Rights Policy, 28/03/2018: <a href="http://sustainability.adityabirla.com">sustainability.adityabirla.com</a>]</li> <li>• Met: UNGC principles 1 &amp; 2: The Company states that 'We adhere to our Group's policy on Human Rights, through which we support the principles ascribed in the UN Global Compact, and this is binding on all employees.' [Sustainability Report 2017 -18, 01/02/2019: <a href="http://ultratechcement.com">ultratechcement.com</a>]</li> <li>• Not met: UDHR</li> <li>• Not met: International Bill of Rights</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: UNGPs</li> <li>• Not met: OECD</li> </ul>
A.1.2	Commitment to respect the human rights of workers	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: UNGC principles 3-6: The Company states that 'We adhere to our Group's policy on Human Rights, through which we support the principles ascribed in the UN Global Compact, and this is binding on all employees.' [Sustainability Report 2017 -18, 01/02/2019: <a href="http://ultratechcement.com">ultratechcement.com</a> &amp; Sustainability Report 2018 - 19, 02/2020: <a href="http://ultratechcement.com">ultratechcement.com</a>]</li> <li>• Not met: Explicitly list All four ILO apply to EX BPs: Although the company has explicitly mentioned each of the UNGC which are relevant to human rights (ILO core), no evidence that this commitments apply to extractive business partners was found. [Sustainability Report 2017 -18, 01/02/2019: <a href="http://ultratechcement.com">ultratechcement.com</a> &amp; Sustainability Report 2018 - 19, 02/2020: <a href="http://ultratechcement.com">ultratechcement.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Explicit commitment to All four ILO Core: In addition of mentioning each of the UNGC which are relevant to human rights (ILO core), the Company states that 'We adhere to our Group's policy on Human Rights, through which we support the principles ascribed in the UN Global Compact, and this is binding on all employees'. In relation to freedom of association and collective bargaining, it states to 'uphold the freedom of association and the effective recognition of the right to collective bargaining'. [Sustainability Report 2017 -18, 01/02/2019: <a href="http://ultratechcement.com">ultratechcement.com</a> &amp; Sustainability Report 2018 - 19, 02/2020: <a href="http://ultratechcement.com">ultratechcement.com</a>]</li> <li>• Met: Respect H&amp;S of workers: The company claims to 'be committed to provide a safe work place'. [Our SHE Policy, 01/04/2010: <a href="http://ultratechcement.com">ultratechcement.com</a>]</li> <li>• Met: H&amp;S applies to EX BPs: The company states that 'a non-negotiable feature at UltraTech, is safety. For us, this strongly embedded core value is seen as the 'only way to operate' and we engage with all our stakeholders, be it our employees, suppliers, contractors or community, while keeping this philosophy in mind'. [Sustainability Report 2017 -18, 01/02/2019: <a href="http://ultratechcement.com">ultratechcement.com</a> &amp; Sustainability Report 2018 - 19, 02/2020: <a href="http://ultratechcement.com">ultratechcement.com</a>]</li> </ul>
A.1.4	Commitment to engage with stakeholders	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Commits to stakeholder engagement: The company states that 'Stakeholder Engagement is the pillar that connects us to the most important components of sustained existence of business – our stakeholders. Our institutionalized channels of interactions with the stakeholders provide us perspectives on internal and external scenarios that have potential to impact our business. Through</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>engagement with our strategic selected stakeholders we work out the key issues and trends to identify the external factors that poses risks to our business. Hence, we have established various thought exchange platforms with key technical experts and strategic stakeholders to gain knowledge on critical parameters and stay abreast with evolving industry paradigms.' Furthermore, 'UltraTech believes that sustainability can be fully cascaded and integrated into the core business model of the organisation, through collaboration with the stakeholders. Being one of the three pillars of our Group Sustainability Framework, stakeholder engagement occupies centre-stage in our sustainability journey.' [Sustainability Report 2018 - 19, 02/2020: <a href="http://ultratechcement.com">ultratechcement.com</a> &amp; Sustainability Report 2018 - 19, 02/2020: <a href="http://ultratechcement.com">ultratechcement.com</a>]</p> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Commits to engage stakeholders in design: The Company states that 'UltraTech believes that sustainability can be fully cascaded and integrated into the core business model of the organisation, through collaboration with the stakeholders. Therefore, we continually strengthen our engagement with our stakeholders through multiple channels. Collaboration not only strengthens sustainability at UltraTech, it also contributes to the Sustainable Development Goals, which are mapped to our business goals.' Furthermore, it indicates that the Company's engagement approach is to 'Identify stakeholder concerns through regular feedback and set the priorities accordingly; Encourage active collaborations with stakeholders to get an external viewpoint.' However, no clear commitment regarding stakeholders engagement in human rights matters approach design was found. Additional evidence was not found in more recent documents. [Sustainability Report 2017 -18, 01/02/2019: <a href="http://ultratechcement.com">ultratechcement.com</a>]</li> <li>• Not met: Regular stakeholder design engagement</li> </ul>
A.1.5	Commitment to remedy	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Commits to remedy: The Company states that 'Every Aditya Birla Group Company endeavours to achieve our commitment by: [...] Providing access to remedy by resolving grievances in a timely and culturally appropriate manner.' However, no evidence regarding a wider commitment to remediate other impact scenarios different from grievances (i.e. due diligences) was found. [Human Rights Policy, 28/03/2018: <a href="http://sustainability.adityabirla.com">sustainability.adityabirla.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Not obstructing access to other remedies</li> <li>• Not met: Collaborating with other remedy initiatives</li> <li>• Not met: Work with EX BPs to remedy impacts</li> </ul>

## Embedding Respect and Human Rights Due Diligence

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.1	Responsibility and resources for day-to-day human rights functions	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Commits to ILO core conventions: See indicator A.1.2</li> <li>• Not met: Senior responsibility for HR</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Day-to-day responsibility</li> <li>• Not met: Day-to-day responsibility for EX BRs</li> </ul>
B.2.1	Identifying: Processes and triggers for identifying human rights risks and impacts	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: Identifying risks in own operations: The company claims that 'material issues were identified on the basis of information garnered from our varied stakeholder groups through ongoing engagements. Through interactions with specialists, who may have a significant point of view on our business, we were able to capture a broader, forward looking perspective. This ensured a full and fair view of best practices and trends of sustainability in defining our materiality.' [Sustainability Report 2017 -18, 01/02/2019: <a href="http://ultratechcement.com">ultratechcement.com</a>]</li> <li>• Not met: identifying risks in EX business partners: Although the Company describes the system it has in place to identify risks in own operations, it does not mention how this matter is addressed with the Company's business partners. Additional evidence was not found in more recent documents. [Sustainability Report 2017 -18, 01/02/2019: <a href="http://ultratechcement.com">ultratechcement.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Ongoing global risk identification</li> <li>• Not met: In consultation with stakeholders</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Not met: In consultation with HR experts: The company claims to consult with specialists, but there is no evidence of human rights experts precisely: 'these material issues were identified on the basis of information garnered from our varied stakeholder groups through ongoing engagements. Through interactions with specialists, who may have a significant point of view on our business, we were able to capture a broader, forward looking perspective. This ensured a full and fair view of best practices and trends of sustainability in defining our materiality'. Additional evidence was not found in more recent documents. [Sustainability Report 2017 -18, 01/02/2019: <a href="http://ultratechcement.com">ultratechcement.com</a>]</li> <li>• Not met: Triggered by new circumstances</li> <li>• Not met: Explains use of HRIAs or ESIA (inc HR)</li> </ul>
B.2.2	Assessing: Assessment of risks and impacts identified (salient risks and key industry risks)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Salient risk assessment (and context): The Company states that 'in the year 2015-16 we conducted our materiality assessment process in accordance with our sustainability framework. Accordingly, we carried out a detailed and structured materiality assessment to identify, prioritise and validate aspects considering our Group sustainability framework'. However, no evidence found of the process the assess the potential human rights salient issues, including how geographical, economic, social or other factors were taken into account. Additional evidence was not found in more recent documents. [Sustainability Report 2017 -18, 01/02/2019: <a href="http://ultratechcement.com">ultratechcement.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Public disclosure of salient risks</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> </ul>
B.2.3	Integrating and Acting: Integrating assessment findings internally and taking appropriate action	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Action Plans to mitigate risks</li> <li>• Not met: Including amongst EX BPs</li> <li>• Not met: Example of Actions decided: The company describes various examples of actions points to tackle risks, but no human rights key industrial risks were found. Additional evidence was not found in more recent documents. [Sustainability Report 2017 -18, 01/02/2019: <a href="http://ultratechcement.com">ultratechcement.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> </ul>
B.2.4	Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: System to check if Actions are effective</li> <li>• Not met: Lessons learnt from checking effectiveness</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both requirement under score 1 met</li> </ul>
B.2.5	Communicating : Accounting for how human rights impacts are addressed	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Comms plan re identifying risks</li> <li>• Not met: Comms plan re assessing risks</li> <li>• Not met: Comms plan re action plans for risks</li> <li>• Not met: Comms plan re reviewing action plans</li> <li>• Not met: Including EX business partners</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	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Channel accessible to all workers: The Company states that 'our comprehensive grievance management system encourages employees to proactively report on human rights violations, sexual harassment and discrimination'. However, details of this system were not found. Additional evidence was not found in more recent documents. [Sustainability Report 2017 -18, 01/02/2019: <a href="http://ultratechcement.com">ultratechcement.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			Score 2 <ul style="list-style-type: none"> <li>• Met: Number grievances filed, addressed or resolved: The Company claims that no grievance related to human rights issues was filed in the past financial year. [Annual Report 2018-19, 24/04/2019: <a href="http://ultratechcement.com">ultratechcement.com</a>]</li> <li>• Not met: Channel is available in all appropriate languages</li> <li>• Not met: Expect EX BPs to have equivalent grievance system</li> <li>• Not met: Opens own system to EX BPs workers</li> </ul>
C.2	Grievance channel(s)/mechanism(s) to receive complaints or concerns from external individuals and communities	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Grievance mechanism for community</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Describes accessibility and local languages</li> <li>• Not met: Expects EX BPs to have community grievance systems</li> <li>• Not met: EX BPs communities use global system</li> </ul>
C.7	Remedying adverse impacts and incorporating lessons learned	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Describes how remedy has been provided</li> <li>• Not met: Says how it would remedy key sector risks</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Changes introduced to stop repetition</li> <li>• Not met: Approach to learning from incident to prevent future impacts</li> <li>• Not met: Evaluation of the channel/mechanism</li> </ul>

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

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

### Disclaimer

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

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

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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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