

Company Name Under Armour
Industry Apparel (Supply Chain only)
UNGP Core Score (*) 14.5 out of 26

Score	Out of	For indicators
Governance and Policy Commitments		
2	2	A.1.1 Commitment to respect human rights
0.5	2	A.1.2 Commitment to respect the human rights of workers
2	2	A.1.4 Commitment to engage with stakeholders
2	2	A.1.5 Commitment to remedy
Embedding respect and Human Rights Due Diligence		
Embedding respect		
0.5	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
2	2	B.2.2 HRDD - Assessing: Assessment of risks and impacts identified (salient risks and key industry risks)
1	2	B.2.3 HRDD - Integrating and Acting: Integrating assessment findings internally and taking appropriate action
0	2	B.2.4 HRDD - Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts
0.5	2	B.2.5 HRDD - Reporting: Accounting for how human rights impacts are addressed
Remedies and Grievance Mechanisms		
2	2	C.1 Grievance channels/mechanisms to receive complaints or concerns from workers
0	2	C.2 Grievance channels/mechanisms to receive complaints or concerns from external individuals and communities
1.5	2	C.7 Remedying adverse impacts and incorporating lessons learned
14.5	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"> • Met: General HRs commitment: In its Code of Conduct, it is stated that 'Under Armour is committed to upholding the human rights and dignity of the people who make our products'. [Code of Conduct, 2019: about.underarmour.com] • Met: UDHR: The Company states in its Modern Slavery Statement 2020: 'Under Armour, Inc. ("UA") respects human rights including those defined in the United Nations (UN) Universal Declaration of Human Rights and the International Labor Organization (ILO) Declaration on Fundamental Principles and Rights at Work .' [Modern Slavery Statement 2020, 19/06/2020: about.underarmour.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: UNGPs: The Modern slavery statement reads: 'UA is also committed to responsible business practices including as defined by the Organisation for Economic Co operation and Development (OECD) Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights'. [Modern Slavery Statement 2020, 19/06/2020: about.underarmour.com]
A.1.2	Commitment to respect the human rights of workers	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: ILO Core: In relation to the Company's own activities, the Code of Conduct only refers to equal opportunities and harassment. On the other hand, all the detailed reference in the website to the ILO core elements refer to supply chain or partners but not to its own operations. [Approach to labor practices, N/A: investor.underarmour.com & Labour, Health & safety, N/A: about.underarmour.com] • Not met: UNGC principles 3-6 • Met: Explicitly list ALL four ILO for AP suppliers: The Supplier code of conduct - that is aligned with the FLA Code- contains an explicit commitment to all ILO core standards. Specifically on freedom of association and collective bargaining, the code states that suppliers and subcontractors 'shall recognize and respect the right of employees to freedom of association and collective bargaining'. In relation to these last two it states the following: 'Under Armour suppliers and their subcontractors shall recognize and respect the right of employees to freedom of association and collective bargaining. Employers must develop and implement effective industrial relations systems and mechanisms to resolve internal disputes, including employee grievances and ensure effective communication with employees'. [Supplier code of conduct, N/A: investor.underarmour.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Explicit commitment to All four ILO Core: The Fair labour association 'board of directors accredited the social compliance program of Under Armour, Inc. In February 2019. The accreditation confirms the company has strong policies and practices in place to set goals, monitor, and remediate problems to improve conditions for the workers within its global supply chain'. However, this indicator looks for evidence of specific policy commitment that also covers Company's own employees. [Press Release UA accredited FLA, 14/03/2019: about.underarmour.com & Fair Labour Association Report- UA Assessment for accreditation, 02/2019: fairlabor.org] • Not met: Respect H&S of workers: The Company indicates that 'Under Armour is committed to preventing workplace violence and maintaining a safe work environment. We have zero tolerance for workplace violence'. However, no evidence found of a commitment to respecting the health and safety of workers. [Code of Conduct, 2019: about.underarmour.com] • Met: H&S applies to AP suppliers: The supplier code of conduct contains a statement on health and safety in the workplace [Supplier code of conduct, N/A: investor.underarmour.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not met: working hours for workers • Met: Working hours for AP suppliers: The supplier code of conduct contains a statement on hours of work including regular working hours, overtime, and time for rest: 'The regular work week shall not exceed 48 hours. Under Armour suppliers and their sub contractors shall allow workers at least 24 consecutive hours of rest in every seven-day period. All overtime work shall be consensual. Under Armour suppliers and their subcontractors shall not request overtime on a regular basis and shall compensate all overtime work at a premium rate. Other than in exceptional circumstances, the sum of regular and overtime hours in a week shall not exceed 60 hours.' [Supplier code of conduct, N/A: investor.underarmour.com]
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"> • Met: Regular stakeholder engagement: The Fair Labour Accreditation Report details the Company's Civil Society Engagement Strategy including the civil society organizations and unions and worker representative structures engaged in the last period in China, Bangladesh, Malaysia, and Central America. [Fair Labour Association Report- UA Assessment for accreditation, 02/2019: fairlabor.org] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Regular stakeholder design engagement: The FLA accreditation report describes how the Company's strategy includes stakeholder engagement as part of social compliance practices, including meeting with local civil society organisations and/or unions prior to each audit. In the Modern Slavery statement the Company reports how assessors are required to consult with worker representatives, unions and federations, if available, in an effort to gain understanding/knowledge of factory conditions before the assessment starts on a site. [Fair Labour Association Report- UA Assessment for accreditation, 02/2019: fairlabor.org & Modern Slavery Statement 2020, 19/06/2020: about.underarmour.com]
A.1.5	Commitment to remedy	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Commits to remedy: The Company states: 'UA is committed to remedy adverse impacts on individuals, workers and communities to which it may have caused or contributed'. [Modern Slavery Statement 2020, 19/06/2020: about.underarmour.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Not obstructing access to other remedies: The Company also states: 'UA does not obstruct access to other forms of remedy [...]' [Modern Slavery Statement 2020, 19/06/2020: about.underarmour.com] • Met: Work with AP suppliers to remedy impacts: The Company states that when problems are identified it works with 'suppliers to support their corrective actions, ensure the supplier is committed to continuous improvement over time and to direct them to engage in related capacity building, as applicable.' On the same statement the Company describes its Collaboration on Remediation Related to Migrant Labor in Malaysia: 'Throughout 2019, UA continued to engage closely with management at the Malaysian facility profiled to ensure ongoing progress on remediation efforts.' It also indicates that, when it receives worker grievances, 'we investigate them and take action, including asking suppliers to remedy issues. We will work directly with the manufacturer to find a solution, or we may engage third-parties, including the FLA, to conduct investigations or to support the factory in resolving them'. 'We also work with other brands that share our suppliers to identify issues and seek to implement jointly near-term corrective actions in addition to building more sustainable systems for the future'. [Modern Slavery Statement 2020, 19/06/2020: about.underarmour.com]

Embedding Respect and Human Rights Due Diligence

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.1	Responsibility and resources for day-to-day human rights functions	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Commits to ILO core conventions: See indicator A.1.2. Companies are awarded this if they are committed either to the ILO Declaration (or each ILO Core area) or the UN Global Compact.

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Met: Senior responsibility for HR: The Company indicates in its MSA Statement 2020: 'UA's Sustainability team, led by our Chief Sustainability Officer, is primarily responsible for creating, implementing, operationalizing and enhancing policies, standards, procedures, and structures related to human rights (including the ILO Core Labor Standards), as well as transparency'. In addition, on its website, the Company states: 'The [Sustainability] team is led by the Vice President of Sustainability and Corporate Social Responsibility, who reports directly to Under Armour's General Counsel and the Executive Vice President of Legal Affairs'. [Sustainability, N/A: about.underarmour.com & Modern Slavery Statement 2020, 19/06/2020: about.underarmour.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Day-to-day responsibility: In addition to the role of the VP of Sustainability, the Company indicates that "it has a Sustainability Council that meets regularly. This cross-functional committee comprises senior and operationally responsible leaders, including our Chief Supply Chain Officer and leaders from Sourcing, Supply Chain, Materials Innovation, Digital, Licensing, and Legal. The Council's responsibilities include striving to incorporate the results of Under Armour's Sustainability program and related due diligence efforts into business processes, and helping to drive operational improvements. The Council is also charged with periodic reviews of issues, risks, findings, and trends related to assessments of manufacturers for compliance with laws and labor-related codes and benchmarks'. 'The Sustainability team serves the regions in which our supply chain operates, with teammates in Central America and Southeast Asia, as well as the United States. Our headquarters team in Baltimore is strategically located on the same floor as Sourcing, Supply Chain, Planning, and Manufacturing Excellence'. Moreover, in the Fair Labour Association accreditation report it is explained that 'since 2014, the Sustainability Team has grown to seven full-time members: the VP, Sustainability & CSR, two managers and two analysts at its headquarters, and its Western Hemisphere Sustainability Manager, an independent contractor based in El Salvador. The Sustainability Team is backfilling an Asia-based Eastern Hemisphere Sustainability Manager role and is approved to add two analyst-level positions in 2019'. [Sustainability, N/A: about.underarmour.com & Fair Labour Association Report- UA Assessment for accreditation, 02/2019: fairlabor.org] • Met: Day-to-day responsibility for AP in supply chain: In addition to the evidence presented above, the Company indicates in its MSA Statement 2020: 'transparency. Sustainability and Sourcing teams collaborate closely, seeking to work with manufacturing business partners that over time strive to perform better on key labor and other human rights performance indicators.' [Sustainability, N/A: about.underarmour.com & Modern Slavery Statement 2020, 19/06/2020: about.underarmour.com]
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"> • Not met: Identifying risks in own operations: The Company indicates in its MSA Statement: 'UA is committed to improve the systems we have in place to identify and address human rights related risks, including those related to modern slavery. We regularly update these systems based on findings from third party assessments and engagements with suppliers, external stakeholders and third party experts. Updates are also based on information we receive from organizations such as the FLA, knowledgeable stakeholders and organizations and based upon the results from risk mapping exercises that focus on salient human rights risks, the presence of vulnerable groups and/or sourcing location risks. Our human rights due diligence process includes a country level risk model for new sourcing countries. This tool scores countries against factors including perceived General Governance Capacity, Protection of fundamental human rights as outlined in the International Bill of Rights, and Respect for the ILO's Eight Core Conventions . UA uses this assessment tool when considering sourcing from a new country and to help foster greater internal awareness of country level risks and trends. It has also been used to enhance the company's ability to engage with suppliers about related potential risks.' It is not clear, however, whether this identification and assessment process applies to the Company's own operations and employees (potential human rights issues for the Company itself). [Modern Slavery Statement 2020, 19/06/2020: about.underarmour.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Met: Identifying risks in AP suppliers: As indicated above, the due diligence process 'includes a country level risk model for new sourcing countries. This tool scores countries against factors including perceived General Governance Capacity, Protection of fundamental human rights as outlined in the International Bill of Rights, and Respect for the ILO's Eight Core Conventions . UA uses this assessment tool when considering sourcing from a new country and to help foster greater internal awareness of country level risks and trends. It has also been used to enhance the company's ability to engage with suppliers about related potential risks.' [Modern Slavery Statement 2020, 19/06/2020: about.underarmour.com & Fair Labour Association Report- UA Assessment for accreditation, 02/2019: fairlabor.org] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Ongoing global risk identification: See above • Met: In consultation with stakeholders: The Company indicates that as part of its due diligence process, it 'regularly update these systems based on findings from third party assessments and engagements with suppliers, external stakeholders and third party experts'. [Modern Slavery Statement 2020, 19/06/2020: about.underarmour.com] • Not met: In consultation with HR experts: As indicated above, as part of its due diligence process, it 'regularly update these systems based on findings from third party assessments and engagements with suppliers, external stakeholders and third party experts.' However, CHRB could not find information about the consulted experts. [Modern Slavery Statement 2020, 19/06/2020: about.underarmour.com] • Met: Triggered by new circumstances: As indicated above: 'Our human rights due diligence process includes a country level risk model for new sourcing countries'. [Modern Slavery Statement 2020, 19/06/2020: about.underarmour.com]
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"> • Met: Salient risk assessment (and context): Following the identification work mentioned, the Company indicates that 'we worked to understand better how different audit findings for these five issues may suggest, or contribute to, risk – along the country or region where the factory is located. At a high-level, there were some indications [...] that in some cases, risk may relate as much, if not more, to a factory's location than to the type of manufacturing process it performs. Our team also considered whether historical or other information could clarify whether certain locations have heightened risk profiles for non-compliance with other FLA benchmarks. We have also analysed history risk by country, with the goal of devoting additional attention in ongoing Sustainability team work and engagement to potentially higher risk areas'. In addition, in its MSA Statement 2020, it indicates: '[...] UA used a materiality process that included a risk lens to identify a list of issues for reporting [...]. Since the UA questionnaire based assessment tool is based on the FLA Code and Benchmarks and the FLA's own Foundational SCI Assessment tool, the tool is inherently designed to help us identify and manage risks that are salient to the apparel industry.' [Modern Slavery Act Statement 2019, 30/04/2019: underarmour.co.uk & Modern Slavery Statement 2020, 19/06/2020: about.underarmour.com] • Met: Public disclosure of salient risks: The Company discloses in its latest UK MSA its Areas of Risks: Forced or Compulsory Labor, Child Labor, Freedom of Association and Collective Bargaining, Occupational Health and Safety, Fair Compensation, Non-Discrimination, Diversity and Equal Opportunity'. [Modern Slavery Statement 2020, 19/06/2020: about.underarmour.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Both requirements under score 1 met
B.2.3	Integrating and Acting: Integrating assessment findings internally and taking appropriate action	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Action Plans to mitigate risks: In its MSA 2019 the Company presents its Annual Highlights where it summarizes key steps it has taken in 2018 to try and further protect workers in our supply chains from human rights impacts related to its business activities. However, no evidence found of a description of the Company's global system to take action systematically against all the human rights risks identified and assessed, or how the company addresses specifically each salient issue. No new relevant evidence found in latest reports. [Modern Slavery Act Statement 2019, 30/04/2019: underarmour.co.uk] • Not met: Including in AP supply chain: Most of the actions reported in the Company's MSA 2019 are focused on the supply chain, however CHRB could not find a description of the Company's global system and how it applies in its supply chain. No new relevant evidence found in latest reports. [Modern Slavery Act Statement 2019, 30/04/2019: underarmour.co.uk]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Met: Example of Actions decided: In relation to migrant labour, the Company states that 'we engaged with Verité to advise us on opportunities to clarify and/or strengthen our expectations of suppliers and capacity building efforts related to modern slavery, with a special focus on foreign migrant workers. We also worked with Verité to identify and prioritize sourcing locations where we should consider focused assessments on risks posed by suppliers' recruitment, hiring and employment of foreign migrant workers'. Additionally, 'UA successfully encouraged our Malaysian suppliers to engage directly with Verité on capacity building opportunities to address risks of modern slavery and to enhance sustainably related systems and processes'. In relation to this issue, the latest Slavery Statement indicates that 'To help address the risk of similar adverse impacts in the future, learnings from this remediation work are also being used to inform how we evolve our social compliance program. Specifically, it has reinforced the need to continue conducting the focused migrant labor assessments from 2018 and to develop a formal Migrant Labor Policy with Supporting Standards. We are also updating our audit and due diligence tools based on guidance from third party experts'. [Modern Slavery Statement 2020, 19/06/2020: about.underarmour.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 • Not met: Lessons learnt from checking effectiveness <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirement under score 1 met
B.2.5	Communicating : Accounting for how human rights impacts are addressed	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Comms plan re identifying risks: In order to be awarded this indicator, the Company needs to achieve at least 1,5 points in B.2.1 • Met: Comms plan re assessing risks: See 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 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 <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Responding to affected stakeholders concerns • 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	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Channel accessible to all workers: The Company discloses various channels where concerns can be reported, including a hotline. [Code of Conduct, 2019: about.underarmour.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> • Met: Number grievances filed, addressed or resolved: The Company reports in its MSA 2020: 'In 2019, we received five complaints related to supply chain social compliance through our grievance channels (these are separate from supplier factory level mechanisms). Of these complaints, two were related to alleged verbal harassment/abuse. Of the remaining complaints, one was related to worker retrenchment, one was related to freedom of association and one was related to foreign migrant worker issues. Follow up investigations have been carried out for all of these cases and remediation plans have been developed. All cases from 2018 except for one appear to have been remediated.' From 2019 cases, 4 are still open and 1 has been closed. It is not clear, however, if these are all the human right-related complaints from 2019, including own operations since they are explicit about supply chain. Regarding 2018, the Company indicated that 'In 2018, we received eight complaints through our grievance channels. Of these complaints, one turned out to be associated with a factory that was not an active supplier of UA products. Of the remaining complaints, three related to foreign migrant worker issues and four to potential freedom of association violations. Follow-up investigations have been carried out for all of these cases and remediation plan developed. Two of the seven cases have now been formally closed based on progress against the remediation plan and five remediation cases are ongoing'. [Modern Slavery Statement 2020, 19/06/2020: about.underarmour.com & Modern Slavery Act Statement 2019, 30/04/2019: underarmour.co.uk] • Met: Channel is available in all appropriate languages: The Company indicates in its MSA Statement: 'The hotline mechanism featured in the UA Code is available to internal UA teammates and external stakeholders and provides an option to report anonymously and in local language depending on your location.' The Hotline website is available in more than 50 countries. [Modern Slavery Statement 2020, 19/06/2020: about.underarmour.com & Hotline, N/A] • Met: Expect AP supplier to have equivalent grievance systems: In the Supplier Code of Conduct, the Company indicates: 'Under Armour suppliers and subcontractors must effectively implement a non-retaliation policy, procedures and reporting channels that enable workers to express anonymously and safely their concerns about workplace conditions directly to factory management and to other parties without fear of retribution, retaliation or any other adverse action.' In addition, the Company's Fair Labor Association Report 2019 - Assessment for Accreditation says: 'UA assesses grievance mechanisms in its factory assessment process through the UA audit tool. The assessment tool verifies the presence of a confidential reporting channel or grievance system, a nonretaliation policy, regular investigation of submitted grievances, responses provided by management, and communication on the grievance procedures. [...] assessors must review grievance logs and verify through worker interviews that workers know how to use the channel'. [Fair Labour Association Report- UA Assessment for accreditation, 02/2019: fairlabor.org & Supplier code of conduct, N/A: investor.underarmour.com] • Met: Opens own system to AP supplier workers: The Code of conduct for suppliers indicates that 'suppliers and subcontractors and their employees may report violations of this code to Under Armour's Hotline electronically and/or suppliercode@underarmour.com. The hotline is monitored 24 hours a day, seven days a week'. [Supplier code of conduct, N/A: investor.underarmour.com]
C.2	Grievance channel(s)/mechanism(s) to receive complaints or concerns from external individuals and communities	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: Grievance mechanism for community: No statement found indicating that the channels are open to external stakeholders including communities. [Hotline, N/A] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Describes accessibility and local languages • Not met: Expects AP supplier to have community grievance systems: Supplier Code of Conduct indicates: 'Under Armour suppliers and subcontractors must effectively implement a non-retaliation policy, procedures and reporting channels that enable workers to express anonymously and safely their concerns about workplace conditions directly to factory management and to other parties without fear of retribution, retaliation or any other adverse action'. However, the provision is focused on grievance mechanism for suppliers' workers, there is no reference to external stakeholders, including local communities. Moreover, the Fair Labor Association Report also indicates that: 'UA assesses grievance mechanisms in its factory assessment process through the UA audit tool. The assessment tool verifies the presence of a confidential reporting channel or grievance system, a nonretaliation policy, regular investigation of submitted grievances, responses

Indicator Code	Indicator name	Score (out of 2)	Explanation
			provided by management, and communication on the grievance procedures. For every audit, UA includes a MAP on grievance systems, regardless of violations found. The MAP requires the factory to identify the person responsible for handling grievances and encourages the factory to have multiple channels for grievance mechanisms for the workers.' CHRB could not find a reference to a grievance mechanism available for external stakeholders, including local communities. [Supplier code of conduct, N/A: investor.underarmour.com & Fair Labour Association Report- UA Assessment for accreditation, 02/2019: fairlabor.org] • Not met: AP supplier communities use global system
C.7	Remedying adverse impacts and incorporating lessons learned	1.5	The individual elements of the assessment are met or not as follows: Score 1 • Met: Describes how remedy has been provided: The Fair Labor Association Report indicates: 'In 2018, UA and Nike, an accredited Participating Company, notified the FLA about engagement with an investigative non-profit organization that had provided a report related to working conditions at an apparel manufacturer in Malaysia, a supplier for both companies. This report included recruitment fee and other workplace violations at the facility. Prior to receiving the report, UA and Nike had already been working, since 2017, to remediate the violations surfaced during their respective audits around the payment of recruitment fees and working conditions. Upon receiving the report, UA and Nike had verified the supplier had already started a pay-out process to reimburse foreign migrant workers for the recruitment fees. The supplier provided one pay-out in 2018 and is scheduled to make another payment in February 2019 to reimburse the workers for the fees they had paid. [...] UA, Nike, and the suppliers' other customers then worked with the supplier to enhance its systems for recruitment, hiring, and employment of workers and enhance the system to provide pay-outs to the workers in 2018 and in 2019. Both pay-outs averaged \$350-\$400 per worker, with about 950 workers receiving both pay-outs in 2018 and 2019.' In addition, in its MSA Statement 2020, the Company reports on the Malaysia Migrant Labor Remediation Case. [Fair Labour Association Report- UA Assessment for accreditation, 02/2019: fairlabor.org & Modern Slavery Statement 2020, 19/06/2020: about.underarmour.com] Score 2 • Met: Changes introduced to stop repetition: With respect the Malaysia Migrant Labor Remediation Case, where a third-party audit discover several violations against migrant workers, the Company indicates: 'To help address the risk of similar adverse impacts in the future, learnings from this remediation work are also being used to inform how we evolve our social compliance program. Specifically, it has reinforced the need to continue conducting the focused migrant labor assessments from 2018 and to develop a formal Migrant Labor Policy with Supporting Standards. We are also updating our audit and due diligence tools based on guidance from third party experts' [Modern Slavery Statement 2020, 19/06/2020: about.underarmour.com] • Not met: Evaluation of the channel/mechanism: CHRB has not identified any documents in the public domain which provide all the information required to meet this indicator.

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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