

Corporate Human Rights Benchmark 2020 Company Scoresheet



Company Name	VF Corporation
Industry	Apparel (Supply Chain only)
UNGP Core Score (*)	18.5 out of 26

Score	Out of	For indicators				
Governance	Governance and Policy Commitments					
2	2	A.1.1 Commitment to respect human rights				
2	2	A.1.2 Commitment to respect the human rights of workers				
1	2	A.1.4 Commitment to engage with stakeholders				
2	2	A.1.5 Commitment to remedy				
		nan Rights Due Diligence				
	ng respect					
2	2	B.1.1 Embedding - Responsibility and resources for day-to-day human rights functions				
Human F	Rights Due Dilige	nce (HRDD)				
2	2	B.2.1 HRDD - Identifying: Processes and triggers for identifying human rights risks and impacts				
1	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 an	d Grievance Me	chanisms				
1.5	2	C.1 Grievance channels/mechanisms to receive complaints or concerns from workers				
2	2	C.2 Grievance channels/mechanisms to receive complaints or concerns from external individuals and communities				
1.5	2	C.7 Remedying adverse impacts and incorporating lessons learned				

10 F	20
18.5	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	The individual elements of the assessment are met or not as follows: Score 1 • Met: General HRs commitment: The Company states in its Human Rights Commitment that it is 'committed to respecting the fundamental human rights of anyone who engages in work or other activities connected to our business operations and supply chain'. [Human Rights Commitment (2020 update), 2020: dlio3yog0oux5.cloudfront.net] Score 2 • Met: UNGPs: The Company commits 'to respecting all human rights as outlined in the United Nations Guiding Principles on Business and Human Rights, the Ten Principles of the United Nations Global Compact, and the OECD Guidelines for Multinational Enterprises and other applicable OECD guidance'. [Human Rights Commitment (2020 update), 2020: dlio3yog0oux5.cloudfront.net] • Met: OECD: See above [Human Rights Commitment (2020 update), 2020: dlio3yog0oux5.cloudfront.net]
A.1.2	Commitment to respect the human rights of workers	2	 The individual elements of the assessment are met or not as follows: Score 1 Met: ILO Core: In its S&R Report the Company indicates: 'VF clearly communicates our expectations for respecting human rights through our Code of Conduct for our own operations and through our Global Compliance Principles with suppliers'. The Code of Business Conduct does not cover all ILO core (only no- discrimination), however the Code adds: 'At VF, we have adopted Global Compliance Principles to govern all facilities that produce goods for our Company. These principles reflect our commitment to individual rights throughout our operations, including the right to work freely, bargain collectively and be compensated fairly. VF follows applicable labor laws in place wherever we operate, and does not permit the use of forced or involuntary labor in any of our operations or the operations of facilities that produce goods for VF. We do not permit discrimination against or harassment of our colleagues who choose to be represented by a trade union. For additional information, see our Global Compliance Principles.' Its Global Compliance Principles cover own operations and suppliers and includes provisions for all ILO core. [Code of Business Conduct, update October 2019, 22/10/2019: <u>dlio3yog0oux5.cloudfront.net</u> & Global Compliance Principles apply to 'all facilities that produce goods for VF Corporation or any of its subsidiaries, divisions, or affiliates, including facilities owned and operated by VF and its contractors, agents and suppliers, referred to in this document as VF Authorized Facilities.' The principles cover all ILO core areas: No person shall be employed at an age younger than 15 or under the age for completing compulsor

Indicator Code	Indicator name	Score (out of 2)	Explanation
Indicator Code	Indicator name	Score (out of 2)	 Explanation Company indicates: 'Authorized Facilities shall recognize and respect the right of employees to freedom of association and collective bargaining. No employee shall be subject to harassment, intimidation or retaliation in their efforts to freely associate or bargain collectively.' [Code of Business Conduct, update October 2019, 22/10/2019: d1io3yog0oux5.cloudfront.net & Global Compliance Principles (website), 04/2019: vfc.com] Met: Respect H&S of workers: See above. In addition its Global Compliance Principles, regarding Health and Safety, states that 'VF authorized Facilities must provide their employees with a clean, safe and healthy work environment, designed to prevent accidents and injury to health arising out of or occurring during the course of work. VF Authorized Facilities are required to comply with all applicable, legally mandated standards for workplace health and safety in the countries and communities in which they operate.' [Code of Business Conduct, update October 2019, 22/10/2019: vfc.com] Met: H&S applies to AP suppliers: Its Global Compliance Principles, which cover own operations and suppliers, indicates: 'VF authorized Facilities must provide their employees with a clean, safe and healthy work environment, designed to prevent accidents and injury to nealth arising out of or occurring during the course of work. VF Authorized Facilities are required to comply with all applicable, legally mandated standards for workplace health and safety in the countries and communities in which they operate.' [Code of Business Conduct, update October 2019, 22/10/2019: vfc.com] Met: H&S applies to AP suppliers: Its Global Compliance Principles, which cover own operations and suppliers, indicates: 'VF authorized Facilities must provide their employees with a clean, safe and healthy work environment, designed to prevent accidents and injury to health arising out of or occurring during the course of work. VF Authorized Facilities are required to co
			more than sixty hours per week including overtime or the local legal requirement, whichever is less. A regular work week shall not exceed 48 hours. All overtime must be consensual and not requested on a regular basis. All employees will be entitled to at least 24 hours of consecutive rest in every seven-day period.' [Code of Business Conduct, update October 2019, 22/10/2019: <u>dlio3yog0oux5.cloudfront.net</u> & Global Compliance Principles (website), 04/2019: <u>vfc.com</u>]
			• Met: Working hours for AP suppliers: Its Global Compliance Principles, which covers own operations and suppliers, indicates: 'Employees must not be required, except in extraordinary circumstances, to work more than sixty hours per week including overtime or the local legal requirement, whichever is less. A regular work week shall not exceed 48 hours. All overtime must be consensual and not requested on a regular basis. All employees will be entitled to at least 24 hours of consecutive rest in every seven-day period.' [Global Compliance Principles (website), 04/2019: vfc.com]
A.1.4	Commitment to engage with stakeholders	1	The individual elements of the assessment are met or not as follows: Score 1 • Met: Commits to stakeholder engagement: The Company is 'committed to continued engagement with a variety of stakeholders, including civil society, human and environmental rights organizations, government officials, consumers, employees, suppliers, and supply chain workers to regularly assess the impacts of those changes on our human rights programs' [Human Rights Commitment (2020 update), 2020: dlio3yog0oux5.cloudfront.net] • Met: Regular stakeholder engagement: The Company states that it 'values its stakeholder partnerships and works together with its partners to continuously improve human rights in its supply chain. VF has partnered with a variety of stakeholders to design and implement projects to conduct due diligence and create change. For example, VF partners with the International Organization for Migration and the Mekong Club to better identify and mitigate forced labor in the supply chain. VF also partners with a number of implementing agencies to design and implement programs to improve worker well-being in its communities, including to improve access to water, transportation safety, children's rights, and women's economic empowerment. Additionally this year, VF is creating a formalized stakeholder engagement strategy, in partnership with Business for Social Responsibility, which will guide our long term stakeholder partnership choices.' [2019 CHRB Supplemental Response, 21/06/2019: <u>business-humanrights.org</u>] Score 2 • Not met: Commits to engage stakeholders in design • Not met: Regular stakeholder design engagement: The Company 'recognizes we cannot achieve our goals alone and value our partnerships, collaboration and external engagement. At VF, we collaborate with relevant stakeholders in the

Indicator Code	Indicator name	Score (out of 2)	Explanation
			regularly engaging with numerous external organizations to guide and support key aspects of our Made for Change strategy, including human rights and climate change. VF interacts with a wide range of stakeholder groups, including non- governmental organizations (NGOs), local and national governments, community groups, and multi-brand and multi-stakeholder initiatives.' However, no details found on how the Company regularly (in the past two years) engages affected stakeholders in design or monitoring of its human rights approach. [Stakeholder engagement, N/A: <u>dlio3yog0oux5.cloudfront.net</u>]
A.1.5	Commitment to remedy	2	 The individual elements of the assessment are met or not as follows: Score 1 Met: Commits to remedy: The Company discloses the following in its Human Rights Commitment: 'Developing processes to avoid causing or contributing to adverse human rights impacts is a high priority for our teams. We are committed to providing access to an effective remedy without retaliation. In providing a remedy, we do not obstruct access to judicial mechanisms.' [Human Rights Commitment (2020 update), 2020: <u>dlio3yog0oux5.cloudfront.net</u>] Score 2 Met: Not obstructing access to other remedies: See above [Human Rights Commitment (2020 update), 2020: <u>dlio3yog0oux5.cloudfront.net</u>] Met: Work with AP suppliers to remedy impacts: In its S&R Report the Company indicates: 'If suppliers accept the offer, we work with them to further assess working conditions and remediate problems. In circumstances where supplier improvement efforts are sub-standard or non-existent, we end our partnership.' [Sustainability and Responsibility Report 2016, 2017: <u>s3.amazonaws.com</u>]

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	The individual elements of the assessment are met or not as follows: Score 1 • Met: Commits to ILO core conventions: See indicator A.1.2. The Company is committed to each ILO core • Met: Senior responsibility for HR: As indicated in the Company's Human Rights Commitment, VF's Vice President of Global Corporate Sustainability & Responsibility oversees the implementation of human rights commitments'. [Human Rights Commitment (2020 update), 2020: <u>d1io3yog0oux5.cloudfront.net</u>] Score 2 • Met: Day-to-day responsibility: The Company describes its Sustainability & Responsibility Community Practice: 'The VF Sustainability & Responsibility Community of Practice (CoP) is the catalyst for scaling sustainable innovation and practices throughout our Company. The CoP comprises dedicated practitioners embedded within our business units and brands who activate our strategy, partner with internal and external stakeholders, and drive performance.' The CoP includes: Global Sustainability Team, Inclusion and Diversity Team, Brand Sustainability Teams, External Engagement and Government Affairs Team, Product Stewardship and Traceability Team, Responsible Sourcing Team, Social Compliance and Auditing Team, and Responsible Sourcing Advisory Council. [Made for Change Sustainability and Responsibility Report 2018, 2019: <u>d1io3yog0oux5.cloudfront.net</u>] • Met: Day-to-day responsibility for AP in supply chain: See above. The CoP includes, among other teams, the Responsible Sourcing Team which 'works to continuously elevate the social and environmental performance in our supplier factories, including a dedicated focus in operating in safe, healthy environments where human rights are respected', and the Social Compliance and Auditing Team, which 'coordinates the regular auditing of all Tier 1 and strategic Tier 2 factories used by VF.' [Made for Change Sustainability and Responsibility Report 2018, 2019: <u>d1io3yog0oux5.cloudfront.net</u>]

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.1	Identifying: Processes and triggers for identifying human rights risks and impacts	2	The individual elements of the assessment are met or not as follows: Score 1 • Met: identifying risks in own operations: In its S&R Report 2016, the Company describes its process to identify material aspects & boundaries: 'The scope of our sustainability strategy and its impact is far reaching, It extends beyond the operations where we have direct ownership and control, and requires dedicated engagement of our supply chain professionals, business partners and expert stakeholders. [] In 2017, we reviewed our 2014 materiality assessment to begin reassessment of our priority issues. We amended this list as a result of new developments in the apparel and footwear sector, areview of peer materiality assessments, ongoing dialogue with stakeholders, NGO questionnaires, and lifecycle assessment results. We then prioritized the list through engagement with key external stakeholder groups including: environmental and human-rights focused NGOs, ESG investment rating agencies, trade organizations and academics, as well as internal groups, including representatives from VF's major brands and regions, and our Supply Chain, Responsible Sourcing, Public Affairs and Marketing teams'. [Sustainability and Responsibility Report 2016, 2017: <u>s3.amazonaws.com</u>] • Met: Identifying risks in AP suppliers: See above [Sustainability and Responsibility Report 2016, 2017; <u>s3.amazonaws.com</u>] score 2 • Met: Ongoing global risk identification: In its Sustainability and Responsibility Report 2016, the Company describes its process to review its human rights risks identification and assessment: 'In 2017, we reviewed our 2014 materiality assessment to begin reassessment of our priority issues. We amended this list as a result of new developments in the apparel and footwear sector, a review of peer materiality assessment, ongoing dialogue with stakeholders, NGO questionnaires, and lifecycle assessment results. We then prioritized the list through engagement with key external stakeholder groups including: environment
В.2.2	Assessing: Assessment of risks and impacts identified (salient risks and key industry risks)	1	The individual elements of the assessment are met or not as follows: Score 1 • Met: Salient risk assessment (and context): Following the identification of material human rights issues, the Company states 'We then prioritized the list through engagement with key external stakeholder groups including: environmental and human-rights focused NGOs, ESG investment rating agencies, trade organizations and academics, as well as internal groups, including representatives from VF's major brands and regions, and our Supply Chain, Responsible Sourcing, Public Affairs and Marketing teams. We then calculated the significance of these issues through responses from each stakeholder group, where the importance of a given issue on the business and its social, environmental and economic impact was ranked and assigned a weighting. Interviews were then conducted to better understand stakeholder perspectives, determine the relative priority of each issue, and assist in the identification of solutions'. [Sustainability and Responsibility Report 2016, 2017: <u>s3.amazonaws.com</u>] • Not met: Public disclosure of salient risks: The Company indicated in the CHRB submission 2016 that: 'As reflected in our materiality assessment and Global Compliance principles, the following human rights-related issues are deemed most salient: Global Compliance Principles: Legal and ethical business practices, child/juvenile labor, forced labor, wages and benefits, hours of work, freedom of association and collective bargaining, health and safety, non-discrimination, harassment, women's rights, subcontracting, monitoring and compliance, informed workplace, worker residence, facility security and environmental protection'. The Company also discloses in its S&R Report 2016 a prioritisation matrix which cover its significant S&R impacts, risks, and opportunities throughout the value chain, however, it is not clear if this matrix is the result of the salient risk assessment or a process of identification. [Sustainability and Responsibili

Indicator Code	Indicator name	Score (out of 2)	Explanation
			Score 2
			• Not met: Both requirements under score 1 met
Indicator Code B.2.3	Indicator name	Score (out of 2)	Score 2
		1	equality.' However, no description found of what risk approach actions have been taken to mitigate these risks. [CHRB submission 2016, 2016 & Made for Change Sustainability and Responsibility Report 2018, 2019: <u>dlio3yog0oux5.cloudfront.net</u>] • Not met: Including in AP supply chain: See above. Additionally, the Company discloses the process it has to audit suppliers. However, it is unclear how this is used to systematically mitigate salient risks in the supply chain. [CHRB submission 2016, 2016 & Made for Change Sustainability and Responsibility Report 2018, 2019: <u>dlio3yog0oux5.cloudfront.net</u>] • Met: Example of Actions decided: The Company discloses the following: 'Both our 2017 and 2019 human rights risk assessment identified FOA as a salient human rights risk for VF Corporation. [] ' In 2018 we funded an Industrial Relations

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B.2.4	Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts	0	The individual elements of the assessment are met or not as follows: Score 1 • Not met: System to check if Actions are effective: The Company indicated in the CHRB submission 2016 that 'VF tracks the effectiveness of actions taken to address human rights risks and impacts through follow-up compliance audits. The Compliance and Sustainable Operations teams work together to enhance interventions going forward, using monthly factory reports (described above) as a baseline for progress'. However, this evidence comes from a source that has more than three years. In addition, indicator looks for evidence of system to check whether Company's salient issues are being mitigated, rather than following up whether suppliers corrective action plans have been implemented. In addition, the Company discloses information in CHRB Platform about its Worker and Community Development program: 'VF's Worker and Community Development program's goal is to objectively improve the lives of 1 million workers by 2025. In the past year, the initiative at VF positively affected over 106,000 workers in 5 countries. The program is guided by a robust Theory of Change, accompanied by a quantitative Monitoring, Evaluation and Learning (MEL) framework, that provides VF management with a tool to assess each intervention's effectiveness. As a result of implementing robust MEL framework, VF is able to assure our Worker and Community Development interventions continuously create positive change for each beneficiary.' However, no evidence of a global system to check actions taken could be found in a document from the last three reporting years. No evidence found in additional feedback provided to the Company to CHRB for this indicator. [CHRB submission 2016, 2016 & 2019 CHRB Supplemental Response, 21/06/2019: <u>business-</u> humanrights.org] • Not met: Lessons learnt from checking effectiveness: The Company released information about what it does to prevent child labour and figures about audit results. However, no information coul
B.2.5	Communicating : Accounting for how human rights impacts are addressed	0.5	The individual elements of the assessment are met or not as follows: Score 1 • Met: Comms plan re identifying risks: See indicator B.2.1 • 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 AP suppliers: 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 Score 2 • Met: Responding to affected stakeholders concerns: The Company indicates: 'During the past year, an interested stakeholder brought an issue to VF's attention about an underlying cultural practice in a supply chain factory that undermined the rights of certain workers. VF immediately assigned an internal team to respond to this situation. In addition, VF pulled together a multi-brand and multi-stakeholder group to provide additional scale to responding to the situation. VF provided funding to the group, while also acting in a leadership capacity to build a framework of policies and activities to prevent the situation from occurring.' [2019 CHRB Supplemental Response, 21/06/2019: <u>business-humanrights.org</u>] • 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)/mec hanism(s) to receive complaints or concerns from workers	1.5	The individual elements of the assessment are met or not as follows: Score 1 • Met: Channel accessible to all workers: In its Code of Business Conduct, the Company indicates: 'The Ethics Helpline is free, confidential and available 24 hours a day, 7 days a week around the world. If you don't want to identify yourself, you can make a report anonymously where allowed by law'. If you call from outside US, the Company indicates to visit a website platform named 'Ethics Point' which is 'a comprehensive and confidential reporting tool to assist management and employees to work together to address fraud, abuse, and other misconduct in the workplace, all while cultivating a positive work environment.' This channel is available to all employees working directly for VF Corporation and covers human rights issues included in its Code of Business Conduct such or the law. [Code of Business Conduct, update October 2019, 22/10/2019: dilo3yogDoux5.cloudfront.net & Ethics Point: <u>secure.ethicspoint.com</u>] Score 2 • Not met: Number grievances filed, addressed or resolved: The Company reports 'In 2019, VF investigated a total of 1,021 reports globally. Of the 1,021 reports received through the Ethics Helpline and via the VF Open Door Policy: Eight were substantiated reports of Supplier, Contractor or Third-Party Misconduct; Seventy eight were substantiated reports of Discriminatory or Harassing Conduct'. However, it is not clear if these substantiated reports include all human-rights- related complaints. Evidence requires includes total number of human rights- related complaints filed and either number of them resolved or addressed. [CHRB Supplemental Response 2020, 2020: <u>business-humanrights.org</u>] • Met: Channel is available in all appropriate languages: Its Ethics Point platform is available in 14 languages, including Chinese, Arabic, Polish, Romanian and Bengali. In addition, its Ethics Helpline is available in 'over 100 languages'. [Ethics Point: <u>secure.ethicspoint.com</u> & Ethics and Compliance 2019
C.2	Grievance channel(s)/mec hanism(s) to receive complaints or concerns from external individuals and communities	2	The individual elements of the assessment are met or not as follows: Score 1 • Met: Grievance mechanism for community: The Helpline is available to anyone: 'Labor issues can be reported through the VF Ethics Helpline, which includes multiple channels for raising concerns. The Helpline is a free, confidential way for anyone to seek guidance, ask a question or raise a concern. It is available 24 hours a day/seven days a week in every country where VF has associates. Reporters can contact the Helpline in over 100 languages, and anonymous reporting is available where allowed by law.' [Modern Slavery Statement 2019, 10/2019: vfc.com] Score 2 • Met: Describes accessibility and local languages: See above [Modern Slavery Statement 2019, 10/2019: vfc.com] • Met: AP supplier communities use global system: The Company discloses the following: 'VF's Ethics Helpline and other grievance mechanisms are available to the entire supply chain, including workers in the second or third tier of the supply chain.' As stated above, the mechanism is available to anyone. [Modern Slavery Statement 2019, 10/2019: vfc.com]
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: On its website section 'Bangladesh FAQs', the Company describes its actions to remedy safety issues in Bangladesh factories: 'As a founding member of the Alliance for Bangladesh Worker Safety and through our own independent efforts such as our Responsible Sourcing program, VF is taking action every day to improve the working conditions

Indicator Code	Indicator name	Score (out of 2)	Explanation
			in factories where we make or source our products, demonstrating our long-term global commitment to worker safety.' Each year, the Alliance for Bangladesh publish a remediation progress report. Additionally, in the LABS newsletter, the Company indicates 'For the LABS-related issue reported in Vietnam, the worker called the Helpline to inform that she and some other workers were getting electrical sensation on fingertips when they were touching the cutting table. She
			had was reported to the factory authorities and root cause for identified – which was hot wire and cold wire coming in contact with each other – but the issue was
			not resolved. She had then called the Helpline. On receiving the complaint, LABS factory coordinator reached out to the factory management, who informed that the cutting machine's wire was loose and they have reconnected it.' [LABS Quarterly Newsletter, April 2020, 04/2020: <u>labsinitiative.com</u> & Alliance for Bangladesh Worker Safty - Annual Report, 11/2017:
			bangladeshworkersafety.org] Score 2
			• Met: Changes introduced to stop repetition: The Company states in its Disclosure to CHRB Platform: 'Safety is non-negotiable at VF. We have integrated our learnings from the safety-related incidents at factories in Bangladesh into our supply chain
			activities, significantly reducing the risk of future safety-related occurrences. VF was a founding member of the Alliance for Bangladesh Worker Safety in Bangladesh, driving remediation through all our suppliers in Bangladesh. VF was instrumental in the stration of Nicanon, a successor organization to the Alliance VE
			instrumental in the creation of Nirapon, a successor organization to the Alliance. VF leadership in both initiatives in Bangladesh is reinforced through our election to the Board of Directors and consistent leadership activities. Leveraging our learnings from Bangladesh, VF collaborated with other apparel brands to create the Life and
			Building Safety initiative (LABS, <u>labsinitiative.com</u>), which has extended the safety inspections from Bangladesh to Vietnam and India. Continuing with our leadership role in these initiatives, VF has been elected to the LABS Executive Steering
			Committee. Each of these initiatives aims to protect workers from preventable structure, fire, and electrical safety risks in apparel and footwear producing factories.' In addition the Company quotes the Alliance for Bangladesh Progress -
			Statistics website, to indicate the changes introduced to stop repetition in safety matters: 'All Alliance factories are required to undergo inspections (structural, fire, and electrical) by a qualified assessment firm before producing for our members.
			These assessments provide factory owners with a technical understanding of the fire safety and structural concerns related to their facilities and lead to the development of a Corrective Action Plan (CAP). After the inspection, factory
			representatives attend a CAP meeting in the Alliance office to go over the inspection results and align on an approved CAP, which will guide factory management on the actions needed to remediate each non-compliance (NC) and improve safety conditions for their garment workers. Alliance factories are
			expected to continue remediation in order to achieve CAP completion by July 2018. Remediation verification visits (RVVs) are conducted to verify progress on remediation as per the factory's original CAP. Each factory will receive at least
			three verification visits before going through a CAP Closure Verification Visit to confirm that all findings from their initial CAP are closed. The Alliance categorizes non-compliances (NCs) by both priority level (high, medium, and low) and discipline
			(electrical, fire, and structural). Remediation progress can be seen within each priority level and discipline by showing whether NCs are completed, in progress, or not started, as verified onsite during RVVs. Factories that fail to make adequate
			progress, especially in remediation of high-priority NCs, are submitted to the Alliance escalation process. Escalation indicates that members and factories must take immediate action to ensure remediation issues are quickly addressed. If
			adequate progress is not made within the specified timeframe, escalated factories will be suspended and removed from the Alliance compliant factory list.' [Alliance Progress - Statistics, 08/2018: <u>bangladeshworkersafety.org</u> & 2019 CHRB Supplemental Response, 21/06/2019: <u>business-humanrighte org</u>]
			 Supplemental Response, 21/06/2019: <u>business-humanrights.org</u>] Not met: Evaluation of the channel/mechanism: The Company states that 'LABS Helpline was launched in Vietnam and India for the factories associated with the program in both countries. The Helpline provides the factories with a direct access
			to the LABS program for reporting issues related to fire, electrical and structural safetyThe Helpline numbers will be displayed in all factories associated with the program. Key data from the Helpline will also be published by LABS on a regular
			basis on the website as well as the newsletter.' However, no evidence of evaluation of the effectiveness of the mechanism could be found. [CHRB Supplemental Response 2020, 2020: <u>business-humanrights.org</u>]

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

Indicator Code	e Indicator name	Score (out of 2)	Explanation
E(1).0	Serious allegation No 1		 Headline: SOMO report accuses large clothing brands such as H&M, Gap, VF of having their clothes made in Bangladesh by suppliers where working hours exceed 60 hours a week. Area: Working hours Story: A 2017 report by the Centre for Research on Multinational Corporations (SOMO) has accused clothing brands such as VF, Gap and H&M of having their
			clothes made in Bangladesh by suppliers where working hours exceed 60 hours a week. Working weeks exceeding 60 hours were reported at eight factories of companies supplying brands including: C&A, H&M, VF Corporation, Gap and
			Kmart. Some workers were reportedly being forced to do additional overtime, having to regularly work until midnight and being paid for additional hours separately in cash. Even when overtime payments were included in the wages, not one of the interviewed workers earned a living wage. The average total take-home
			salary was only a third of what would constitute a living wage. • Sources: [SOMO Report January 2017: <u>stopkinderarbeid.nl]</u>
E(1).1	The Company has responded		The individual elements of the assessment are met or not as follows: Score 1
	publicly to the allegation	0	Not met: Public response available Score 2
E(1).2	The Company		Not met: Response goes into detail The individual elements of the assessment are met or not as follows:
L(1).2	has appropriate policies in place		Score 1 Met: Company policies address the general issues raised: its Global Compliance
			Principles, regarding Health and Safety, states that 'VF authorized Facilities must provide their employees with a clean, safe and healthy work environment, designed to prevent accidents and injury to health arising out of or occurring during the course of work. VF Authorized Facilities are required to comply with all applicable, legally mandated standards for workplace health and safety in the countries and communities in which they operate.' [Global Compliance Principles
			 (website), 04/2019: vfc.com] Met: Policies apply to the type of business relationships involved: The policies apply to suppliers too [Global Compliance Principles (website), 04/2019: vfc.com] Score 2 Met: Policies address the specific rights in question: The Company's Global
		2	Compliance principles cover all ILO core areas and they 'apply to all facilities that produce goods for VF Corporation, or any of its subsidiaries, divisions, or affiliates, including facilities owned and operated by VF and its contractors, agents and suppliers herein referred to as VF Authorized Facilities'. In addition, the Company also has a principle covering hours of work that indicates 'VF authorized Facilities must ensure employees hours worked shall not, on a regularly scheduled basis, exceed the lesser of (a) the legal limitations on regular and overtime hours in the jurisdiction in which they manufacture of (b) 60 hours per week including overtime
			(except in extraordinary business circumstances). Global compliance principles also covers subcontracting: 'VF Authorized Facilities will not utilize subcontractors in the manufacturing of VF products or components without VF's written approval and only after the subcontractors has agreed to comply with the Terms of engagement, including these Global Compliance Principles. [Global Compliance
E(1).3	The Company		Principles (website), 04/2019: <u>vfc.com</u>] The individual elements of the assessment are met or not as follows:
(,	has taken appropriate action	0	 Score 1 Not met: Engages with affected stakeholders Not met: Encourages linked business to engage affected stakeholders Not met: Provides remedies to affected stakeholders
		U	 Not met: Has reviewed management systems to prevent recurrence Score 2 Not met: Remedies are satisfactory to the victims
E(2).0	Serious allegation No 2		 Not met: Has improved systems and engaged affected stakeholders Headline: Cambodian factory workers suffer mass faintings Area: H&S and Working hours Steen to be a 2017. The Observe and Deviation investigation and in site Deventable
			• Story: In June 2017, The Observer and Danish investigative media site Danwatch reported that more than 500 workers in four factories have been hospitalised over the previous year. Women who collapsed worked 10 hour days, six days a week and the temperature in the factories hit 37 degrees celsius. Puma, Nike, VF Corporation and Asics were contacted by the Observer and said they had investigated the episodes.

Indicator Code	Indicator name	Score (out of 2)	Explanation
			• Sources: [Danwatch - 25/06/2017: <u>old.danwatch.dk</u>][The Guardian - 25/06/2017: the guardian com]
E(2).1	The Company		theguardian.com The individual elements of the assessment are met or not as follows:
	has responded publicly to the allegation	2	 Score 1 Met: Public response available: A company spokesperson stated "It is of absolute importance to VF that all workers in our supplier factories are operating in safe, healthy environments where human rights are respected. Our teams work hard to make certain that working conditions in our contract supplier factories, including temperature or working breaks, are followed per local laws and regulations". [Mass faintings afflict the women who sew our clothes, 24/06/2017: old.danwatch.dk & Cambodian female workers in Nike, Asics and Puma factories suffer mass faintings, 25/06/2017: theguardian.com] Score 2 Met: Response goes into detail: In its response to the allegation, the company goes into detailed explanation. [CHRB Supplemental Response 2020, 2020:
E(2).2	The Company		business-humanrights.org] The individual elements of the assessment are met or not as follows:
L(2).2	has appropriate policies in place	1	 Score 1 Met: Company policies address the general issues raised: In regards to health and safety, the company states "VF Authorized Facilities must fully comply with all applicable laws of the countries in which they are located including all laws, regulations and rules relating to wages, hours, employment, labor, health and safety, the environment, immigration, and the apparel industry." The company has a policy on working hours for VF Authorized Facilities. [Terms of Engagement: <u>s3.amazonaws.com</u>] Met: Policies apply to the type of business relationships involved: The company's Terms of Engagement policy indicates that by accepting orders from VF or its subsidiaries, all contractors, suppliers and agents "will abide by and implement these Terms of Engagement and require the same from each of its VF approved and authorized subcontractors." [Terms of Engagement: <u>s3.amazonaws.com</u>] Not met: Policies address the specific rights in question: The company's Global Compliance Principles states "VF Authorized Facilities must fully comply with all applicable local, state, federal, national, and international laws, rules and regulations including those relating to wages, hours, employment, labor, health and safety, the environment, immigration and the apparel and footwear industry." In regards to health and safety data, the company provides injury data for company-owned and operated manufacturing and distribution centers, but does not provide the same data on its suppliers. [Terms of Engagement: <u>s3.amazonaws.com</u> & Global Compliance Principles: <u>business</u>, hours, employment, labor, health and safety, the environment, immigration and the apparel and footwear industry." In regards to health and safety data, the company provides injury data for company-owned and operated manufacturing and distribution centers, but does not provide the same data on its suppliers. [Terms of Engagement: <u>s3.amazonaws.com</u> & Global Compliance Principles: <u>business-humanrights.org</u>]
E(2).3	The Company has taken appropriate action	1.5	The individual elements of the assessment are met or not as follows: Score 1 • Met: Engages with affected stakeholders: In its submission to the CHRB, VF says that it sent a team to speak with the workers in one of the factory where workers fainted - ' The VF Cambodian Sustainable Operations Team visited the production building, where the event occurred in the days following the incident and interviewed management and workers'. [CHRB Supplemental Response 2020, 2020: <u>business-humanrights.org</u>] • Met: Encourages linked business to engage affected stakeholders: In its submission to the CHRB, VF described its interaction with its suppliers. [CHRB Supplemental Response 2020, 2020: <u>business-humanrights.org</u>] • Met: Provides remedies to affected stakeholders: In its submission to CHRB the company describes that the workers in the factory received medical care in the days following the incidents and improved nutritional education. [CHRB Supplemental Response 2020, 2020: <u>business-humanrights.org</u>] • Met: Has reviewed management systems to prevent recurrence: The company states that it investigated incidents of fainting and required suppliers to corrects faults which led to the fainting. In addition, the company has initiated a programme of nutritional education for the workers as poor nutrition is linked to the mass fainting. [CHRB Supplemental Response 2020, 2020; <u>business- humanrights.org</u>] Score 2 • Not met: Remedies are satisfactory to the victims: There is no evidence that the remedy provided is satisfactory to workers. • Met: Has improved systems and engaged affected stakeholders: VF has improved systems and engaged affected stakeholders. [CHRB Supplemental Response 2020, 2020; <u>business-humanrights.org</u>]

Indicator Code	Indicator name	Score (out of 2)	Explanation
E(3).0	Serious allegation No 3		 Headline: Global brands respond to allegations of union busting at garment factory Area: FoA and CB Story: In December 2018, the Pulido Apparel Company Inc factory in San Luis, Batangas, Philippines closed abruptly, just prior to a collective bargaining agreement that was about to take place. Pulido is a subsidiary of U.S. based Fownes Bros & Co., a leather gloves and fashion accessories manufacturer for brands including VF Corp. Sources state that the factory closed, laid off its workers, and reopened one month later. Union officers allege they were blacklisted, and that the temporary factory shut down was done intentionally to prevent the union from organizing. Sources: [Business and Human Rights Resource Center - 06/02/2019: business-
E(3).1	The Company has responded publicly to the allegation	2	 humanrights.org] The individual elements of the assessment are met or not as follows: Score 1 Met: Public response available: The company's public response states that its policies and principles outline the company's expectations with regards to Freedom of Association and Collective Bargaining. The company states that it is in contact with factory management and is working to understand the situation and the specific allegation. [Philippines: Global brands respond to allegations of union busting at garment factory, 02/2019: <u>business-humanrights.org</u>] Score 2 Met: Response goes into detail: The company provides details of the case in its submission to the CHRB [CHRB Supplemental Response 2020, 2020: <u>business-humanrights.org</u>]
E(3).2	The Company has appropriate policies in place	2	The individual elements of the assessment are met or not as follows: Score 1 • Met: Company policies address the general issues raised: The Code of business conduct states: 'At VF, we have adopted Global Compliance Principles to govern all facilities that produce goods for our Company. These principles reflect our commitment to individual rights throughout our operations, including the right to work freely, bargain collectively and be compensated fairly. VF follows applicable labor laws in place wherever we operate, and does not permit the use of forced or involuntary labor in any of our operations or the operations of facilities that produce goods for VF. We do not permit discrimination against or harassment of our colleagues who choose to be represented by a trade union. [Human Rights Commitment, 12/2019: <u>d1io3yog0oux5.cloudfront.net</u> & Code of Business Conduct, update October 2019, 22/10/2019: <u>d1io3yog0oux5.cloudfront.net</u>] • Met: Policies apply to the type of business relationships involved: The company's Global Compliance Principles apply to its own operations and those of its authorized facilities. [Global Compliance Principles (website), 04/2019: <u>vfc.com</u>] Score 2 • Met: Policies address the specific rights in question: In its Global Compliance Principles, the Company states: 'VF Authorized Facilities shall recognize and respect the right of employees to freedom of association and collective bargaining. No employee shall be subject to harassment, intimidation or retaliation in their efforts to freely associate or bargain collectively.' [Global Compliance Principles (website), 04/2019: <u>vfc.com</u>]
E(3).3	The Company has taken appropriate action	1	 The individual elements of the assessment are met or not as follows: Score 1 Met: Engages with affected stakeholders: In its submission to CHRB, the company states that the sides attended mediation. [CHRB Supplemental Response 2020, 2020: <u>business-humanrights.org</u>] Met: Encourages linked business to engage affected stakeholders: According to VF, 'After receiving information regarding the alleged union-busting at Pulido Apparel Company, our Sustainable Operations team engaged with the factory management ' and that Pulido attended conciliation mediation with the unions in early 2019. [CHRB Supplemental Response 2020, 2020: <u>business-humanrights.org</u>] Met: Provides remedies to affected stakeholders: Company says that 'We understand that as of April of 2019, both sides settled outstanding issues. The details of the conciliation negotiations are bound by the Philippines Labor Code, which directs that information and statements made at conciliation proceedings are privileged communication.' [CHRB Supplemental Response 2020, 2020; <u>business-humanrights.org</u>] Not met: Has reviewed management systems to prevent recurrence: There is no evidence to suggest that the company has reviewed management systems to prevent recurrence.

Indicator Code	Indicator name	Score (out of 2)	Explanation
			Score 2
			• Not met: Remedies are satisfactory to the victims: Though the company says
			that 'We understand that as of April of 2019, both sides settled outstanding issues.
			The details of the conciliation negotiations are bound by the Philippines Labor
			Code, which directs that information and statements made at conciliation
			proceedings are privileged communication', CHRB could not find any other source
			which corroborates this claim and therefore cannot award points here. [CHRB
			Supplemental Response 2020, 2020: <u>business-humanrights.org</u>]
			• Not met: Has improved systems and engaged affected stakeholders: There is no
			evidence to suggest that the company has improved systems and engaged
			affected stakeholders.

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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