

Company Name Western Digital
Industry ICT (Own operations and Supply Chain)
UNGP Core Score (*) 9.0 out of 26

Score	Out of	For indicators
Governance and Policy Commitments		
1	2	A.1.1 Commitment to respect human rights
0.5	2	A.1.2 Commitment to respect the human rights of workers
1	2	A.1.4 Commitment to engage with stakeholders
1	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	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)
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
Remedies and Grievance Mechanisms		
1.5	2	C.1 Grievance channels/mechanisms to receive complaints or concerns from workers
1.5	2	C.2 Grievance channels/mechanisms to receive complaints or concerns from external individuals and communities
1	2	C.7 Remedying adverse impacts and incorporating lessons learned
9.0	26	

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

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

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

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

Detailed assessment

Governance and Policies

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1.1	Commitment to respect human rights	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: General HRs commitment: The Company 'is committed to respecting human rights throughout the world'. [Global Human Rights Policy, N/A] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: UNGPs: The Company's human rights 'commitment is based on internationally recognized human rights and related standards, as outlined in [...] the UN Guiding Principles on Business and Human Rights, and the OECD Guidelines for Multinational Enterprises.' However, 'based on' is not considered a formal commitment according to CHRB wording guidelines. [Global Human Rights Policy, N/A] • Not met: OECD: See above [Global Human Rights Policy, N/A]
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: The Company's 'commitment is based on internationally recognized human rights and related standards, as outlined in [...] the ILO Declaration on Fundamental Principles and Rights at Work'. However, 'based on' is not considered a formal commitment according to CHRB wording criteria. [Global Human Rights Policy, N/A] • Not met: UNGC principles 3-6 • Not met: Explicitly list ALL four ILO for ICT suppliers: The Company discloses that requires its suppliers and contract manufacturers that support the manufacture of Western Digital products to commit to and have policies and programs in place for complying with the Responsible Business Alliance (RBA) Code of Conduct and demonstrate that they have implemented an effective process to communicate the Code's requirements to their next tier suppliers. In the RBA code is described that 'Child labor is not to be used in any stage of manufacturing, Forced, bonded (including debt bondage) or indentured labor, involuntary or exploitative prison labor, slavery or trafficking of persons shall not be used, should be committed to a workforce free of harassment and unlawful discrimination' and with respect freedom of association and collective bargaining, the RBA Code says: 'In conformance with local law, participants shall respect the right of all workers to form and join trade unions of their own choosing, to bargain collectively and to engage in peaceful assembly as well as respect the right of workers to refrain from such activities. Workers and/or their representatives shall be able to openly communicate and share ideas and concerns with management regarding working conditions and management practices without fear of discrimination, reprisal, intimidation or harassment.' However, it is not clear whether the Company is requiring to respecting those rights in all contexts, as it indicates 'in conformance with local law'. In these cases, companies are expected to require alternative mechanisms or equivalent workers bodies where the right to freedom of association and collective bargaining is restricted under law. In its Annual 10k Report, the Company discloses information on collective bargaining agreements. However, no formal commitment could be found. [Modern Slavery and Human Trafficking Statement, FY2019, 04/03/2020 & Responsible Business Alliance Code of Conduct, 2018: responsiblebusiness.org] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Explicit commitment to All four ILO Core: The Company prohibits discrimination, forced labour, child labour and states that it 'supports workers' rights to associate freely and to bargain collectively, where not prohibited by local laws'. However, in relation to these last two, It is not clear whether it is committed to respect these rights in all contexts and locations (i.e alternative mechanisms for those countries where there are legal restrictions to the exercise of these rights), as

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			<p>the Company indicates that it respects these rights 'where not prohibited by local laws'. [Global Human Rights Policy, N/A]</p> <ul style="list-style-type: none"> • Met: Respect H&S of workers: The Company discloses that 'Providing a safe workplace for our employees is a priority at Western Digital'. In addition the Company also discloses that has 'established occupational health and safety management systems at our manufacturing facilities in Asia and we are committed to compliance with applicable occupational health and safety laws and regulations. Western Digital has an integrated corporate quality, environmental, health and safety policy and we establish supporting procedures at our facilities that address occupational safety, emergency preparedness, occupational illness and injury, industrial hygiene, machine safeguarding and physically demanding work'. [Code of Business Ethics: tps://westerndigital.com] • Met: H&S applies to ICT suppliers: The Company discloses that requires its suppliers and contract manufacturers that support the manufacture of Western Digital products to commit to and have policies and programs in place for complying with the Responsible Business Alliance (RBA) Code of Conduct and demonstrate that they have implemented an effective process to communicate the Code's requirements to their next tier suppliers. RBA code requires that 'participants recognize that in addition to minimizing the incidence of work-related injury and illness, a safe and healthy work environment enhances the quality of products and services, consistency of production and worker retention and morale. Participants also recognize that ongoing worker input and education is essential to identifying and solving health and safety issues in the workplace'. [Modern Slavery and Human Trafficking Statement, FY2019, 04/03/2020 & Responsible Business Alliance Code of Conduct, 2018: responsiblebusiness.org] • Not met: working hours for workers: The Company's states it limits 'work hours to sixty hours per week or less, including overtime, except in emergency or unusual circumstances. Workers also receive at least one day off per seven-day work period.' However, no evidence found of references to standard weekly hours or the Company explicitly committing to respect ILO conventions on working hours. [Global Human Rights Policy, N/A] • Not met: Working hours for ICT suppliers: The Company discloses that requires its suppliers and contract manufacturers that support the manufacture of Western Digital products to commit to and have policies and programs in place for complying with the Responsible Business Alliance (RBA) Code of Conduct and demonstrate that they have implemented an effective process to communicate the Code's requirements to their next tier suppliers. RBA code requires the following: 'Working hours are not to exceed the maximum set by local law. Further, a workweek should not be more than 60 hours per week, including overtime, except in emergency or unusual situations. Workers shall be allowed at least one day off every seven days'. However, no details found regarding requirements for suppliers to commit to a maximum of 48 hours for standard weekly hours or to respect international standards on working hours [Modern Slavery and Human Trafficking Statement, FY2019, 04/03/2020 & Responsible Business Alliance Code of Conduct, 2018: responsiblebusiness.org]
A.1.4	Commitment to engage with stakeholders	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Commits to stakeholder engagement: The Company is 'committed to proactively engaging with internal and external stakeholders as we evaluate our impacts and work to improve the effectiveness of our human rights program'. [Global Human Rights Policy, N/A] • Not met: Regular stakeholder engagement <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Commits to engage stakeholders in design • Not met: Regular stakeholder design engagement
A.1.5	Commitment to remedy	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Commits to remedy: 'If Western Digital learns of human rights abuses or other conduct contrary to our policies committed by our employees or suppliers, we take remedial action proportionate to the offense. Such remediation may include conducting an investigation, coordinating a corrective action plan, requiring additional audits (suppliers only), or possible suspension or termination of the relationship'. [Global Human Rights Policy, N/A] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Not obstructing access to other remedies • Not met: Collaborating with other remedy initiatives • Not met: Work with ICT suppliers to remedy impacts: The Company 'constantly monitors its operations and supply chain for risks relating to slavery and human

Indicator Code	Indicator name	Score (out of 2)	Explanation
			trafficking and takes swift action to remediate any issues found.' However, no information found regarding working with suppliers to provide remedy either through suppliers' mechanisms, or through the development of third party non-judicial remedies. [Modern Slavery and Human Trafficking Statement, FY2019, 04/03/2020]

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. • Not met: Senior responsibility for HR: The Company has a Sustainability Working Group whose activities include human rights initiatives. However, it is not clear if this is a senior level body to which overall responsibility for human rights has been allocated. [Global Human Rights Policy, N/A] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Day-to-day responsibility: The Global Human Rights Policy states 'Our Corporate Sustainability team has day-to-day responsibility for implementing this policy. Our Human Resources function enforces the policy within our workforce, and our Supply Chain Management function enforces it throughout our supply chain. Human rights initiatives and activities are managed by a cross-functional Sustainability Working Group including representatives from Corporate Sustainability, Human Resources, Supply Chain Management, Quality, Operations, Sales, and Ethics and Compliance'. [Global Human Rights Policy, N/A] • Not met: Day-to-day responsibility for ICT in supply chain
B.2.1	Identifying: Processes and triggers for identifying 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: Identifying risks in own operations: 'To ensure this policy is effective, Western Digital will both proactively and reactively assess human rights-related risks and potential impacts in connection with our policies, practices and management approach. We conduct human rights due diligence and impact assessments at regular intervals and whenever appropriate based on circumstances or reports.' However, no description of this process could be found. [Global Human Rights Policy, N/A] • Not met: Identifying risks in ICT suppliers: The Company indicates: 'We have internal processes to manage any human rights or labor-related risks discovered through risk assessments or audits by developing targeted corrective action plans and tracking our progress against them. Through these assessments and our collaboration with industry experts, we have identified Malaysia, Thailand and China as particularly susceptible to labor issues, so we closely monitor these locations. Similarly, we have worked with our supply chain to map where their labor sources come from and give suppliers located in Malaysia and Thailand enhanced attention and scrutiny since they have been identified as using foreign workers.' However, no description of a process to identify relevant human rights risks in the supply chain could be found. [Modern Slavery and Human Trafficking Statement, FY2019, 04/03/2020] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Ongoing global risk identification • Not met: In consultation with stakeholders • Not met: In consultation with HR experts • Not met: Triggered by new circumstances
B.2.2	Assessing: Assessment of risks and impacts identified (salient risks and key industry risks)	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: Salient risk assessment (and context) • Met: Public disclosure of salient risks: 'Taking into account Western Digital's unique geographical footprint, industry and business model, we have identified the following four issues as priorities for our company: (1) creating a respectful and inclusive workplace; (2) maintaining fair working conditions and compensation; (3) preventing modern slavery, human trafficking and child labor; and (4) supporting freedom of association and movement. These priorities may evolve over time, consistent with the results of our human rights impact assessments'. [Global Human Rights Policy, N/A] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.3	Integrating and Acting: Integrating assessment findings internally and taking appropriate action	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Action Plans to mitigate risks • Not met: Including in ICT supply chain: The Company has provided comments to CHRB regarding this indicator. However, evidence was not material, as it seems to focus in compliance monitoring. • Not met: Example of Actions decided Score 2 <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	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: System to check if Actions are effective: The Company has provided comments to CHRB regarding this indicator. However, evidence was not material as it seems to focus in compliance monitoring. • Not met: Lessons learnt from checking effectiveness Score 2 <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	The individual elements of the assessment are met or not as follows: Score 1 <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 • Not met: Comms plan re assessing risks: In order to be awarded this indicator, the Company has to achieve a full score in B.2.2 • Not met: Comms plan re action plans for risks: In order to be awarded this indicator, the Company has to achieve a full score in B.2.3 • Not met: Comms plan re reviewing action plans: In order to be awarded this indicator, the Company has to achieve a full score in B.2.4 • Not met: Including ICT suppliers: In order to be awarded this indicator, the Company has to achieve a full score in B.2.2/B.2.3/B.2.4 and at least 1,5 points in B.2.1 Score 2 <ul style="list-style-type: none"> • Not met: Responding to affected stakeholders concerns: The Company has provided comments to CHRB regarding this indicator. However, evidence was not material. • Not met: Ensuring affected stakeholders can access communications

Remedies and Grievance Mechanisms

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.1	Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers	1.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Channel accessible to all workers: The Company 'provides multiple avenues for employees to speak up concerning conduct contrary to our policies, including human rights violations, with the option to report concerns directly to their manager, Ethics & Compliance, Human Resources or Legal, or through our global Ethics Helpline. The Helpline, which is run by a third party, supports anonymous reporting, is available 24 hours a day in roughly 150 languages, and is available online or by phone in local operating areas. We offer the Helpline to anyone who suspects human rights abuses or other misconduct, whether employed by Western Digital or not'. [Global Human Rights Policy, N/A] Score 2 <ul style="list-style-type: none"> • Not met: Number grievances filed, addressed or resolved • Met: Channel is available in all appropriate languages: As above, the Helpline is available in roughly 150 languages. [Global Human Rights Policy, N/A] • Met: Opens own system to ICT supplier workers: The Company discloses the following: 'we invite both employees and business partners to bring human rights issues to our attention, and we protect the people who do. We regularly remind employees and suppliers about the availability of our global ethics helpline, an anonymous service managed by an independent third party, for reporting misconduct or other problems.' [Modern Slavery and Human Trafficking Statement, FY2019, 04/03/2020]

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.2	Grievance channel(s)/mechanism(s) to receive complaints or concerns from external individuals and communities	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Grievance mechanism for community: The Helpline is available to 'anyone who suspects human rights abuses or other misconduct, whether employed by Western Digital or not'. [Global Human Rights Policy, N/A] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Describes accessibility and local languages: The Helpline is available online and in roughly 150 languages. [Global Human Rights Policy, N/A] • Not met: Expects ICT supplier to have community grievance systems: The RBA Code of Conduct applies to suppliers and they are audited based on the Validated Assessment Process, which includes provisions for a grievance mechanism for communities. However, it is unclear if the Company audits on the full Validated Assessment Process, or only uses it as guidance. No further evidence could be found to suggest suppliers are expected to have a grievance mechanism for communities. [Responsible Supply Chain] • Not met: ICT supplier communities use global system: As the Helpline is available to anyone, it is assumed that it is available to communities as well. However, it is unclear if this applies to supplier communities to raise grievances about suppliers. [Global Human Rights Policy, N/A]
C.7	Remedying adverse impacts and incorporating lessons learned	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Describes how remedy has been provided: The Company describes the following case in its supply chain: 'We have at times found violations of our policy against recruitment fees, which we have worked quickly to remediate. Last year, we became aware that a common supplier of Western Digital and other RBA members had violated that policy, and we worked to educate the supplier about our expectations and to change practices. That supplier has subsequently been audited, with a particular focus on the supplier's labor standards and recruitment of foreign workers. This resulted in a reimbursement of nearly USD \$3.3 million in recruitment fees to the supplier's workers. We have also required the supplier to audit the labor brokers in the migrant workers' home country. We continue to work closely with this supplier to ensure the changes made are effective and permanent, and we are using this experience as a case study with our other suppliers.' [Global Human Rights Policy, N/A] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Changes introduced to stop repetition • Not met: Approach to learning from incident to prevent future impacts • Not met: Evaluation of the channel/mechanism

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
E(1).0	Serious allegation No 1		<ul style="list-style-type: none"> • Headline: Cal-Comp Electronics accused of sourcing from recruitment agencies linked to systematic exploitation of migrant laborers in Thailand • Area: forced labour • Story: October 2018, Electronics Watch released a report which found that many migrant workers at Cal-Comp Electronic's manufacturing operations in Thailand remain at a heightened risk of exposure to conditions of forced labour. The report notes that despite changes undertaken by the company in 2016, migrant workers from Myanmar continue to report excessive recruitment fees, in excess of the 79 Euro limit they should have to pay under Myanmar regulations, which are being required by recruitment agencies in Thailand. The report notes that "In some cases workers have reported nearly €700 in recruitment related service fees or costs, equivalent to more than two months salary". A second report, released in February 2020, explains how the situation has improved throughout three years of monitoring and action taken by Electronics Watch and the Migrant Workers Rights Network. It states that while Cal-Comp was not able to control its recruiting agencies, since 2017 all workers controlled their own passports and work permits, they have received their contracts in their native languages, and had received partial reimbursement for their fees. By 2019, the company agreed to pay back all workers' fees who started at the company during or after January 2016. • Sources: [Electronics Watch - 10/2018: electronicswatch.org][BHRRRC - 10/2018: business-humanrights.org][Electronics Watch - 02/2020: electronicswatch.org]
E(1).1	The Company has responded publicly to the allegation	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: Public response available: The Company discloses the following: 'We have at times found violations of our policy against recruitment fees, which we have worked quickly to remediate. Last year, we became aware that a common

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>supplier of Western Digital and other RBA members had violated that policy, and we worked to educate the supplier about our expectations and to change practices. That supplier has subsequently been audited, with a particular focus on the supplier's labor standards and recruitment of foreign workers. This resulted in a reimbursement of nearly USD \$3.3 million in recruitment fees to the supplier's workers.' However, it is unclear if this is the same case referred to in the allegation. [Modern Slavery and Human Trafficking Statement, FY2019, 04/03/2020]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Response goes into detail
E(1).2	The Company has appropriate policies in place	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Company policies address the general issues raised: The Company states it prohibits forced labour. [Global Human Rights Policy, N/A] • Met: Policies apply to the type of business relationships involved: The RBA Code of Conduct, which applies to the Company's suppliers, includes prohibition of forced labour and includes mechanisms to prevent it. [Responsible Business Alliance Code of Conduct, 2018: responsiblebusiness.org] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Policies address the specific rights in question: As above, suppliers must have mechanisms in place to prevent the use of forced labour. [Responsible Business Alliance Code of Conduct, 2018: responsiblebusiness.org]
E(1).3	The Company has taken appropriate action	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Engages with affected stakeholders • Met: Provides remedies to affected stakeholders: In February 2020, Electronics Watch announced that Cal-Comp Electronics had paid full compensation to 10,570 migrant workers for the illegal payment of recruitment fees charge by its recruitment agencies. [Modern Slavery and Human Trafficking Statement, FY2019, 04/03/2020] • Not met: Has reviewed management systems to prevent recurrence: The company explains the case in general terms in its Modern Slavery report 'Last year, we became aware that a common supplier of Western Digital and other RBA members had violated that policy, and we worked to educate the supplier about our expectations and to change practices. That supplier has subsequently been audited, with a particular focus on the supplier's labor standards and recruitment of foreign workers. This resulted in a reimbursement of nearly USD \$3.3 million in recruitment fees to the supplier's workers. We have also required the supplier to audit the labor brokers in the migrant workers' home country. We continue to work closely with this supplier to ensure the changes made are effective and permanent, and we are using this experience as a case study with our other suppliers'. The steps described here cannot be considered as reviewing management systems. [Modern Slavery and Human Trafficking Statement, FY2019, 04/03/2020] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Remedies are satisfactory to the victims: Although remedy has been provided to 10,570 workers, Electronics Watch notes that the remedy is not complete, stating that "Ongoing monitoring by Electronics Watch and MWRN suggests that more than 1,000 workers employed in one legally separate division were bypassed and have not received compensation for the recruitment fees they paid as of the time of this writing. Tracking down former workers who are owed reimbursement is also an ongoing process in which MWRN and others who can communicate with former workers have a vital role." [Modern Slavery and Human Trafficking Statement, FY2019, 04/03/2020] • Not met: 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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