



# COVID-19 and human rights

Assessing the private sector's response  
to the pandemic across five sectors

February 2021

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# 1. Introduction and executive summary

## The context

The coronavirus pandemic is one of the most severe health, humanitarian and economic crises of our time. Outbreaks are affecting all segments of the population in every corner of the globe, however the health and economic impacts of the virus are being borne disproportionately by the poorest and most vulnerable. The effects of COVID-19 and associated restrictions could be felt for decades. In these fast-changing and unprecedented times, decisions made by governments, the international community and the private sector are fundamental in shaping the trajectory of the pandemic and its impact on people worldwide.

The Corporate Human Rights Benchmark (CHRB), part of the World Benchmarking Alliance (WBA), has been assessing the human rights disclosures of some of the largest global companies since 2017. The [latest iteration of the benchmark](#), published in November 2020, assessed the human rights disclosures of 229 global companies across five sectors identified as presenting a high risk of negative human rights impacts. These sectors are agricultural products, apparel, automotive manufacturing, extractives and ICT manufacturing.

Companies have a responsibility to respect the rights of workers and other stakeholders in their operations and across their supply chains at all times. Fulfilling this responsibility is more essential than ever in the present climate, especially where the most vulnerable workers and communities are concerned.

This is why WBA decided to supplement the 2020 CHRB assessment with a separate study, which considers how the same 229 companies have been impacted by, and have responded to, the increased human rights risks and impacts associated with the COVID-19 crisis.

By carrying out this separate study, WBA wanted to explore the response of the private sector to COVID-19. The aim was to identify examples of best practice, where companies have demonstrably placed respect for human rights at the heart of their approach, as well as to highlight instances where companies may have been falling short and, therefore, where increased accountability is needed.

# 1. Introduction and executive summary

## What the study shows

The study highlights some examples of good practice, where businesses have taken steps to ensure that the rights of workers, both within their own operations and their supply chains, were respected during the pandemic. Whilst not widely adopted, this evidence of good practice shows that companies can respond in a meaningful way to the crisis, minimising harm for their workers and those of their suppliers.

- More than 60% of the companies assessed described the steps they have taken to protect the health and safety of their workers. These included facilitating remote working where possible, implementing physical distancing protocols and providing personal protective equipment and hand-washing facilities. A small number of companies reported taking further measures to ensure that more vulnerable workers were afforded special protection, including being given preventive paid sick leave.
- When it comes to purchasing decisions, which are so crucial for managing impacts on workers in supply chains, over a third of companies reported taking at least some measures to limit the financial risks and pressures felt by their suppliers.

- Overall, companies with robust human rights due diligence processes in place demonstrated that they were better equipped to respond to the crisis. Examples of best practice included consulting with worker representatives and vulnerable groups to better understand and manage the risks and impacts related to the pandemic and working with suppliers to implement a rapid response system to respond to any grievances related to COVID-19.

However, in spite of these positive examples, most companies failed to demonstrate that their response to the pandemic was adequate to limit negative impacts on stakeholders, especially in their supply chains, and to ensure that their rights were respected.

- Less than 10% of the companies assessed described how they considered the risks and impacts of COVID-19 on local communities and vulnerable groups in their own operations and supply chains.
- Only 6% of companies indicated that they consult with workers' representatives, communities and vulnerable groups in their own operations when identifying and assessing COVID-19 risks and impacts.
- With regard to worker livelihood, less than half of companies (43%) described how they provide financial support for workers temporarily prevented from working, and only one third of companies described taking steps to avoid redundancies, including through the use of government schemes.

# 1. Introduction and executive summary

- Of the companies assessed in sectors that rely heavily on supply chains (i.e., agricultural products, apparel, electronics and automotive manufacturing), over 70% did not report adopting mitigation measures – such as full and prompt payment for orders placed before the pandemic – for suppliers impacted by changing demands.

Overall, the study shows that the majority of companies, across all sectors, have failed so far to demonstrate a meaningful response to the crisis, and still have a long way to go to adequately manage the risks and impacts of COVID-19. Given the amount of public financial support provided by governments around the world since the beginning of the crisis, the fact that two thirds of companies failed to describe steps taken to avoid redundancies is particularly concerning. The study also shows, however, that certain basic steps to manage the human rights risks and impacts of the crisis have been widely adopted by companies, with a few also demonstrating leading practices. This shows that business *can* place human rights at the heart of their response to the crisis, if they choose to do so.

## Looking forward

The deep-rooted flaws in our system have been fully laid bare by the COVID-19 crisis. The pandemic did not create an entirely new set of risks and impacts for workers and communities. Rather, it exacerbated risks and impacts that have existed for a long time, many of which are deep-rooted and systemic. It has also made them more visible.

This crisis very clearly shows us the crucial importance of social justice, equality and inclusion, and the human rights which underpin them, in the achievement of a sustainable recovery from the pandemic and of the Sustainable Development Goals (SDGs). The SDGs can only be met if no one is left behind in the process, and respect for human rights by companies is essential in ensuring this is the case.

This is why WBA has just launched its [social transformation framework](#) for measuring what the 2,000 most influential companies are doing to ensure people are at the heart of business contributions to the SDGs, through respecting human rights, providing and promoting decent work and acting ethically.

By intensifying public focus on the vulnerability of many individuals and communities, and the conditions in which they work, the pandemic provides us with an opportunity to address the shortcomings in the current system. COVID-19 has shown us that transformation is necessary. The companies that have demonstrated leading practices also show us that such transformation is possible.

## 2. Methodology & research process

The approach for evaluating companies' responses to the COVID-19 crisis drew as much as possible on existing measurement themes from the CHRB Methodology. The CHRB then identified the most relevant measurement areas for assessing COVID-19 related human rights risks and impacts.

The COVID-19 Study focuses on the following areas:

- Governance and policy commitment
- Human rights due diligence, with a focus on health and safety and livelihoods
- Purchasing decisions\*
- Remedy and grievance mechanisms

For every area, we identified 'basic' and advanced' requirements. In most of the survey questions, the 'basic' requirements apply to a company's own operations and the 'advanced' requirements apply to a company's supply chain/business partners' operations, with the exception of purchasing decisions, which applies as a whole to the company's supply chain. The survey questions and requirements can be found in the Annex.

Overall, we assessed 229 companies across five sectors (agricultural products, apparel, extractives, ICT manufacturing and automotive manufacturing), of which 101 responded to the survey. Where

companies did not respond to the survey, the study is based on information found in public documents.

Unlike the usual CHRB assessments, the COVID-19 survey does not score companies. Instead, we used a scaling system to show where we identified positive company practices, and where we did not.

### COVID-19 STUDY SCALING SYSTEM:



No action



Minimal action



Basic action



Advanced action



Comprehensive action

*\*This topic does not apply to extractive companies. For this sector, instead of 'suppliers' the study focuses on what are referred to as 'extractive business partners,' defined as operational level contractors (including on-site and off-site contractors involved in operations, such as those involved in resettlement operations or other similar operations off-site, contracted security providers, etc.) and joint ventures or similar contractual arrangements with multiple parties to carry out exploration and/or production. The question on purchasing decisions does not include the extractive sector.*

## 2. Methodology & research process

The COVID-19 study is a combination of desk-based research and a survey.

First, we undertook an initial assessment of how companies responded to the COVID crisis, using publicly available information and looking at all 229 companies included in the 2020 benchmark. Following this, we shared initial findings with companies, along with the survey questions, and an invitation to provide additional information to complement the assessment of public sources. Company responses to the survey did not have to rely on publicly available information, but responding companies were notified that once sent to the CHRB, these responses would be made public with the launch of the study.

The COVID-19 study takes into account publicly disclosed information and, when available, survey responses. The timeframe for the study was from the beginning of the COVID-19 crisis up until September 2020. With such a significant crisis as this pandemic, where the role of the private sector is being intensely scrutinised, higher expectations are placed on companies to provide disclosures, quickly and accurately. We recognise however that six months into the global pandemic, disclosure patterns were impacted, with some companies shifting their focus to managing the situation.

As such, the study only provides an assessment of companies' responses to the COVID-19 crisis at a certain point in time. We would therefore like to emphasise that the findings are a proxy for good human rights management and not an absolute, exhaustive and definitive measure of company responses to the crisis. An assessment of "No action" does not necessarily mean that bad practices are present or that there is no company action on the issue. Rather, it indicates that we have been unable to identify relevant information in public documentation or in company responses to the survey to inform us about this. Where companies already had some effective policies and processes in place to manage human rights risks and impacts, we did not expect them to set up new ones dedicated specifically to the pandemic, but rather to show how their existing ones have been applied in the context of the COVID-19 crisis.

### 3. Key findings

**KEY FINDING 1: Broad adoption of some measures and leading practices by a few companies show that a good response to the pandemic is possible**

The study shows that certain basic steps to manage the human rights risks and impacts of the crisis have been widely adopted by companies. For example, 90% of companies reported having a grievance mechanism in place through which workers can raise complaints or concerns related to COVID-19 without retaliation.

We can also identify examples of companies demonstrating leading practices across all areas of the assessment. These include adopting measures to mitigate the impacts of the pandemic on suppliers, such as taking steps to maintain demand and to speed up the payment of invoices. They also include addressing the health and safety impacts of the pandemic on vulnerable workers, including establishing channels for mental health support. Some companies have also demonstrated working with suppliers to ensure that all workers are eligible for paid sick leave and other financial support, thereby facilitating workers' ability to follow public health guidance.

Through these good practices, companies are demonstrating that, even in times of crisis, they can behave in a responsible way, fulfilling their human rights obligations and meeting stakeholder expectations. They also provide best practice examples for their peers to emulate. Crucially, by placing human rights at the heart of their response to the crisis, these companies expose the shortcomings of those who have not, so far, been doing enough.

For more specific examples of leading practice, please refer to section 4 below.



90%

**of companies reported having a grievance mechanism through which workers can raise complaints or concerns related to COVID-19**

### 3. Key findings

**KEY FINDING 2: Whilst some companies took steps to protect their workers, most still need to respond to COVID-19 human rights risks and impacts beyond their four walls.**

With regard to companies' own operations, some positive trends were identified across all five sectors, specifically related to governance and policy commitment. Half of the companies indicated that they prohibited retaliation against workers or other stakeholders for raising human rights complaints or concerns during the COVID-19 crisis.

Another positive trend is the steps companies are taking to ensure the health and safety of workers. 69% of companies described how they facilitate remote working where possible, and 63% explained how they have implemented physical distancing protocols and provided personal protective equipment and hand-washing facilities.

Unfortunately, when it came to companies identifying and managing COVID-19 related risks in their supply chain and in the operations of their business partners, results were not as encouraging.

Only 7% of companies stated that their risk identification and assessment processes consider the risks and impacts on local communities and vulnerable groups in their supply chains and business partners' operations, and just 14% described how they work with suppliers and business partners to address the health and safety impacts on vulnerable workers.

Furthermore, while 23% of companies indicated the senior manager role(s) responsible for human rights issues within their own operations, only 13% indicated the ones responsible for relevant human rights issues in the supply chain and business partners' operations during the COVID-19 crisis.

This gap between companies' human rights oversight within their own operations and across their supply chains is consistent with the 2020 CHRB results. These showed that while half of the companies indicated that they have senior managers responsible for relevant human rights issues within the company, only a quarter described how day-to-day management of human rights is allocated across the business and within the supply chain and business partners' operations.

### 3. Key findings

The pandemic has amplified existing risks, disproportionately impacting vulnerable workers, many of whom are located deep in supply chains and with little visibility. Now more than ever, companies must ensure respect for human rights across their activities and their supply chains. They must put a stop to worker exploitation wherever it occurs and make sure that unacceptable practices are not left unchecked in the name of crisis and emergency.



**KEY FINDING 3: The majority of companies do not take particular account of human rights risks faced by vulnerable workers and local communities.**

The COVID-19 pandemic is one of the most severe health and economic crisis of our time, and it is hitting vulnerable workers and communities the hardest. Women, migrant workers, older persons, disadvantaged racial or ethnic groups, and persons with underlying health conditions, as well as informal workers around the world are much more likely to lose their jobs, and more likely to lack health and safety protection in their workplaces. This reality is already driving many into poverty and deepening global social inequalities. There is a dire need for better safeguards to ensure vulnerable workers are not left behind.

And yet, only 8% of companies assessed in this study described how they include consideration of risks and impacts on local communities and vulnerable groups in their own operations, within their supply chain and in their business partners' operations.

### 3. Key findings

Additionally, only 6% of companies indicated that they consult with workers’ representatives, communities and vulnerable groups in their own operations when identifying and assessing COVID-19 related human rights risks and impacts. A quarter of companies described how they address the health and safety impacts on vulnerable workers in their own operations, and less than 15% described doing so within their supply chain and business partners’ operations.

Some companies such as Adidas and Repsol stood out from the rest and reported good practices. For example, Adidas reported that it has been working closely with factories to identify workers at greatest risk, including vulnerable categories such as migrants and women. Repsol stated that they have been holding committees in various countries and workplaces “to follow up the evolution of the pandemic and share prevention measures with different collectives of employees, communities’ leaders and unions.”



### 3. Key findings

**KEY FINDING 4: Too many companies failed to demonstrate responsible purchasing decisions to mitigate the negative impacts on workers in supply chains.**

The impact of COVID-19 has caused demand and supply shocks and disrupted global supply chains, making responsible purchasing decisions more important than ever to ensure that workers are treated fairly.

In the agricultural products, apparel, ICT manufacturing and automotive manufacturing sectors, less than a quarter of companies reported honouring pre-crisis orders in full. Only 15% of companies showed that they took time to assess the human rights risks of purchasing changes during the pandemic, whilst less than a quarter described how they are taking steps to maintain demand and indicated that they take mitigation measures for suppliers impacted by changing demand during the crisis.

**15%**

**of companies assessed the human rights risks of purchasing changes during the pandemic**

**25%**

**took mitigation measures for suppliers impacted by changing demand during the crisis**

These findings suggest a lack of responsible purchasing decisions during the crisis, which can exacerbate systemic weaknesses, inequalities and unacceptable practices in supply chains, risking backsliding on the SDGs.

Some companies, however, reported good practices. For example, Tesco indicated that in light of the difficulties faced by their clothing suppliers, they did not change payment terms or ask for discounts and will use fabric that their suppliers have already bought anticipating future orders. Fast Retailing noted that they have been adjusting production schedules where feasible and re-allocating orders among partner factories to ensure an order distribution that does not expose partner factory to “unacceptable financials risks or pressures.”

**KEY FINDING 5: Companies must tackle the issue of workers’ livelihoods.**

The COVID-19 pandemic has decimated jobs and placed millions of livelihoods at risk, with devastating effects on workers’ welfare and opportunities for decent work. Companies must address the issue of workers’ livelihoods in both their own operations and with their business relationships. Unfortunately, these findings show that most companies are far from doing so.

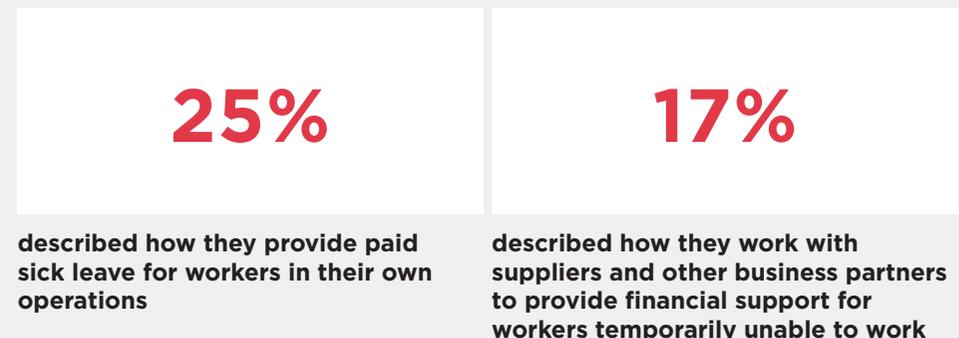
### 3. Key findings

On average across all sectors assessed in this study, less than a quarter of companies described how they provide paid sick leave for workers in their own operations, threatening good health and livelihoods on a global scale.

23% of companies indicated that they provide notice and re-training for workers made redundant, with 21% demonstrating how they plan to re-employ them. Less than half of companies described how they provide financial support for workers temporarily prevented from working. Only one third of companies described the steps they have taken to avoid redundancies, including through the use of government schemes. Given the amount of public financial support provided by governments around the world since the beginning of the crisis, this is especially concerning, and points to a failing by parts of the private sector to contribute to the global response to the pandemic.

When it comes to demonstrating how these risks and impacts are managed within the supply chain and business partners' operations, our study suggests that companies could do a lot more to work together with their business partners to provide support to workers. The vast majority of companies (91%) did not describe working with suppliers and other business partners to provide paid sick leave for workers, whilst 83% did not describe working with suppliers and other business partners to provide financial support for workers temporarily unable to work.

Some companies, however, stood out from their peers by demonstrating efforts to respect workers' livelihoods during the COVID crisis. For example, Hormel Foods indicated that they have been in constant contact with suppliers to ensure they have the same high standards and practices in place for their employees, "which includes paid leave and benefits to any employee who was feeling unwell or quarantined due to testing positive with COVID-19." Nissan Motors reported that employees were informed about the financial support available for workers temporarily unable to work. Tesco stated that "colleagues who are self-isolating are being paid in full for the period of isolation" and that those over 70, vulnerable or pregnant were given twelve-weeks' paid leave immediately.



### 3. Key findings

#### **KEY FINDING 6: Having effective human rights due diligence processes in place leads to better responses to the COVID crisis.**

The UN Guiding Principles on Business and Human Rights (UNGPs) call on all companies to prevent and address adverse impacts with which they may be involved through a human rights due diligence process. The process is key to ensuring that any risks to people are identified and mitigated, and is foundational for companies to drive sustainable change and support the SDGs.

In the context of the COVID-19 pandemic, which has exacerbated significant weaknesses and vulnerabilities throughout global value chains, this process is all the more imperative.

When comparing the [2020 CHRB Benchmark results](#), which assessed companies on their human rights due diligence processes, with the findings of this study, we found a relative correlation between how companies performed on human rights due diligence in the Benchmark on the one hand, and companies' responses to the COVID-19 study on the other.

Our results show that companies that scored above 50% in the CHRB human rights due diligence indicators (B.2.1 – B.2.5) had a better response to the COVID-19 crisis, providing sufficient information to answer one third of the study's questions. In comparison, companies that scored less than 50% on human rights due diligence in the 2020 assessment provided relevant information to answer only 15% of the study questions.

Similarly, companies that met 75% or more of the Benchmark's human rights due diligence requirements provided sufficient information to answer 44% of the COVID questions, and companies that scored 0 on all due diligence indicators in the Benchmark, provided sufficient information to answer only 10% of the study questions.

These findings show that companies that have a robust human rights due diligence process in place are more likely to effectively track shifts in their operating environment and to adapt their response to sudden and extensive disruptions such as pandemics. Continuous and comprehensive human rights due diligence make companies more resilient and better equipped to be part of, and contribute to, a future where no one is left behind. The correlation between the 2020 Benchmark results and the COVID study also highlights, even in unprecedented situations like this pandemic, that it is not only possible but also necessary to have a response that is grounded in human rights standards.

## 4. Examples of leading practice

While the study indicates that companies across all sectors still have a long way to go to appropriately manage the risks and impacts of COVID-19 in their own operations and across their supply chains, our findings also show some leading practices and examples of companies taking steps to ensure that they respect the human rights of workers during the crisis.

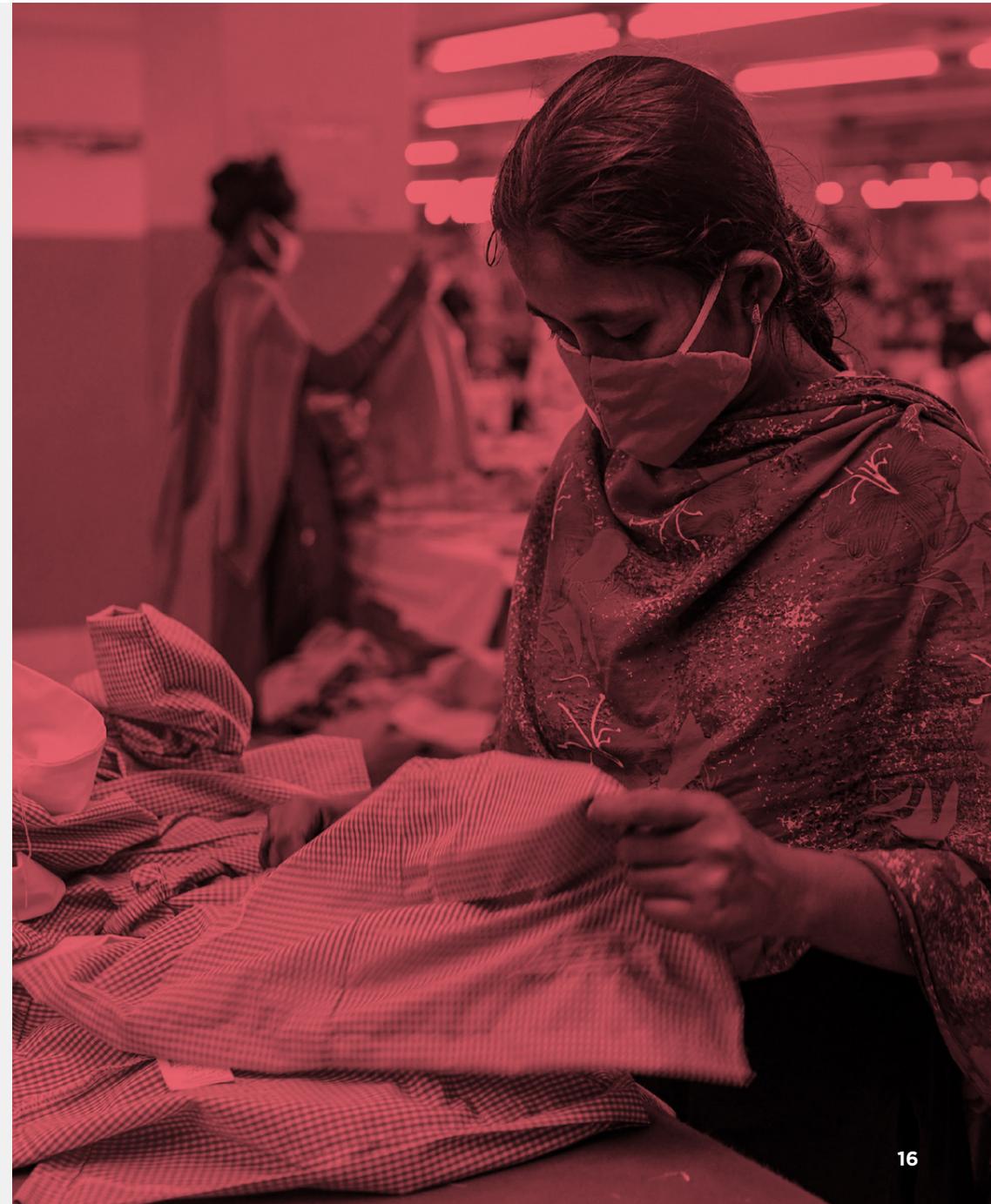
- In the area of **governance and policy commitment**, companies across all sectors performed relatively well in comparison to the other areas of the study, with 50% of companies indicating that they prohibit retaliation against workers or other stakeholders for raising human rights complaints or concerns during the COVID-19 crisis. Out of the five sectors assessed, agricultural product companies have performed slightly better than the other sectors, with some companies such as Wilmar International standing out from their peers. In responding to the survey, the company indicated that it tasked its Chief Sustainability Officer and General Manager for Group Sustainability to oversee its human rights commitments across its supply chain during the COVID-19 crisis.
- When it comes to **identifying and assessing the risks and impacts** specifically related to the COVID-19 crisis, 19% of companies described the process(es) used to identify and assess the human rights risks and impacts related to COVID-19 in their own operations and 14% of companies described the process(es) used to identify and assess these in their supply chain and business partners' operations. The Hershey

Company has shown good practice when it came to including consideration of risks and impacts on local communities and vulnerable groups. In its survey response, the company described how, based on desktop research, engagement with industry, and regular engagement with non-profits, it identified groups such as cocoa farmers, migrant workers, temporary workers, women, older persons and minorities as disproportionately impacted during the crisis.

- When it comes to **integrating findings and taking action to ensure the health and safety and protect the livelihood of workers**, out of the five sectors assessed, agricultural product companies have performed slightly better than other sectors, providing or publishing relevant information on 27% of questions. Among the companies assessed, Unilever stood out from the rest, specifically in how it works with suppliers to implement physical distancing protocols. In its response to the survey, the company indicated that it launched a dedicated supply partner support page which has the latest protocols for factory operations and personal protection equipment. The company also indicated that it put in place strict protocols for hygiene and physical distancing for Unilever's sourcing units and distribution centres, and that in the event its partners have questions related to COVID-19, the company would be happy to share its practices and control measures with them.

## 4. Examples of leading practice

- In regard to demonstrating **responsible purchasing decisions** to mitigate the negative impacts on workers in supply chains during the crisis, 15% of companies showed that they took time to assess the human rights risks of purchasing changes during the pandemic. Some companies, such as Marks & Spencer stood out from the rest, indicating that it paid for all shipped products before production was temporarily halted, as well as for all produced garments that could not be shipped. The company also mentioned that it facilitates the distribution of emergency relief funds, while supporting safe working where manufacturing continues. Apparel company Hugo Boss reported implementing a “dedicated and cooperative Vendor Financing Program” for its suppliers, to give them the option of obtaining earlier payment of invoices.
- When it comes to **commitment to providing for, or cooperating in, remediation for affected individuals and workers** during and after the COVID-19 crisis, companies across all sectors performed relatively well, with 90% of companies indicating that they have a grievance mechanism(s)/channel(s) through which workers can raise complaints or concerns related to COVID-19 without retaliation. Some companies, such as Microsoft, reported good practices, specifically on how it works with its suppliers on this issue. In its survey response, Microsoft indicated that it has set up a rapid response system, allowing suppliers to submit COVID-19 related grievances and receive a response in less than 24 hours.



## 5. Results by sector

This study assessed the 229 companies covered by the 2020 Corporate Human Rights Benchmark. These companies are some of the largest global companies from five sectors identified as presenting a high risk of negative human rights impacts, namely agricultural products, apparel, automotive manufacturing, extractives and ICT manufacturing. A few companies are considered in more than one sector. Where that is the case, a company appears in the analysis and results table for all those sectors. For example, Amazon is considered as an agricultural products, apparel and ICT manufacturing company, and it therefore appears in three of the results tables below.

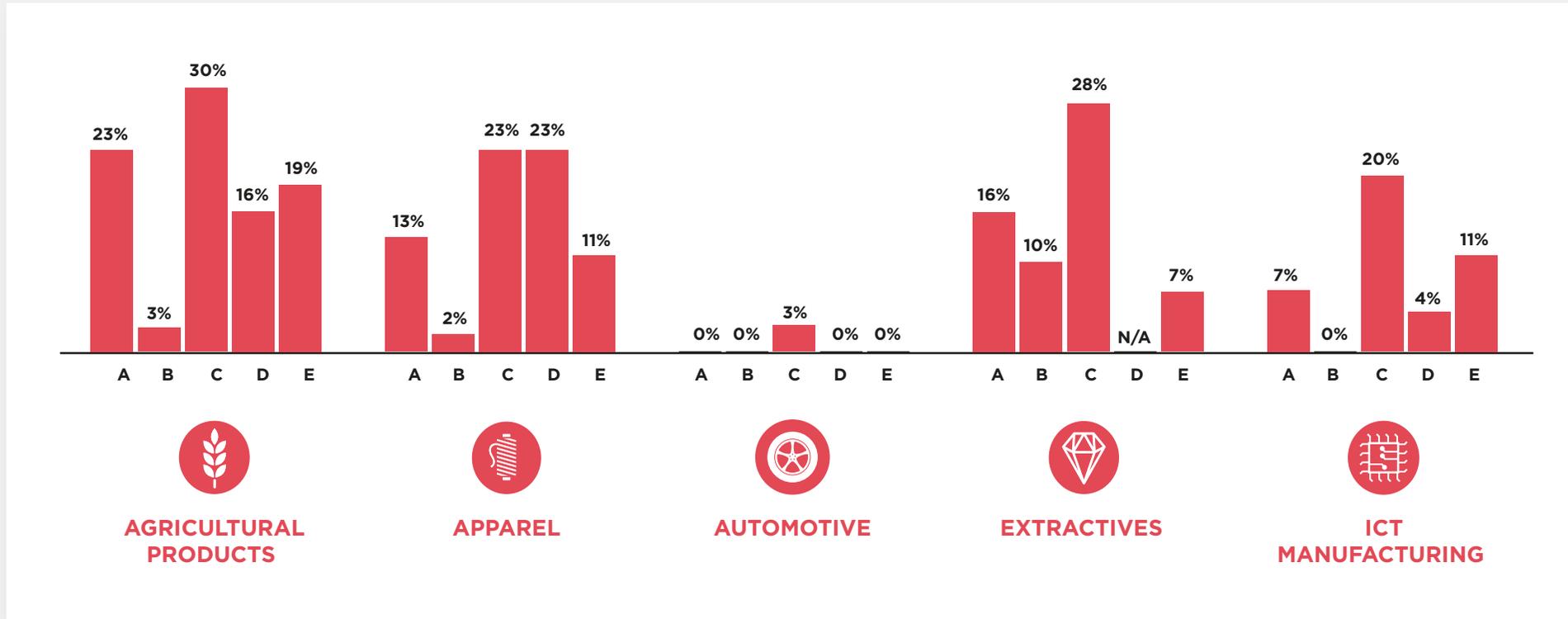
The COVID-19 pandemic has had impacts around the world and on all industries. However, these impacts have been felt very differently by companies depending on their location, sector(s) and size, amongst other factors. Global supply chains have been disrupted, with sectors heavily reliant on multiple suppliers, such as electronics manufacturing, apparel and automotive manufacturing, suffering severe disruptions. The automotive parts and equipment industry was listed by a study<sup>1</sup> amongst the top five industries most impacted by COVID-19 as of September 2020, suffering what the International Labour Organisation (ILO) described as the “triple whammy” of factory closures, supply chain disruption and

a collapse in demand.<sup>2</sup> The same study also listed the oil and gas drilling industry amongst the top five most impacted. The apparel industry has been hit by mass cancellations of orders, with factories having to close and millions of workers in global supply chains hit particularly hard.<sup>3</sup> Agricultural product<sup>4</sup> and food retail<sup>5</sup> companies were put under pressure to prevent a food crisis and guarantee food security, with workers put at extra risk of exposure to infection.

These differences may explain some discrepancies in the level of disclosure and in the survey response rate from one sector to the other. The graph below shows the proportion of companies whose disclosures reflected at least minimal action taken (i.e. the lowest level in the survey’s scaling system), per measurement area and per sector.

## 5. Results by sector

**TABLE:** PROPORTION OF COMPANIES, PER SECTOR, DEMONSTRATING AT LEAST BASIC ACTION (I.E. BASIC, ADVANCED OR COMPREHENSIVE)



- A** Governance and policy commitment
- B** Identifying and assessing risks
- C** Integrating findings and taking appropriate action (health and safety & livelihood)
- D** Purchasing decisions
- E** Remedies and grievance mechanisms

## 5. Results by sector

However, regardless of their specific circumstances, all companies have a responsibility to ensure that the rights of workers in their operations and supply chains are respected, as well as those of the individuals and communities they impact through their business activities. At a time when risks are increased, especially for the most vulnerable workers and communities, it is essential that respect for human rights is not de-prioritised.

This section of the report shows trends at sector level and, for each company, an assessment of whether their public disclosures and/or responses to the survey indicated either no, minimal, basic, advanced or comprehensive action taken. These different levels of response are represented in the result tables below as follows:

### COVID-19 STUDY SCALING SYSTEM:

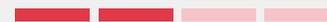
No action



Minimal action



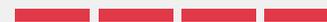
Basic action



Advanced action



Comprehensive action



## 5. Results by sector

### Agricultural products

We looked at 57 of the largest agricultural product companies in the world. Of these 57 companies, 32 (56%) responded to the survey. Where companies did not respond to the survey, the study is based only on information found on public documents.

In comparison with the other sectors assessed, agricultural product companies performed well on committing to providing for, or cooperating in, remediation for affected individuals and workers during and after the crisis. 19% of companies in this sector disclosed information that demonstrated advanced practices, such as establishing a rapid response system to respond to any grievances related to COVID-19.

When it comes to integrating findings and taking appropriate action on health and safety and worker livelihood, companies in this sector performed relatively well, with 7% disclosing information that showed advanced practices. Similar to companies in the other four sectors, agricultural product companies did not perform well on identifying and assessing risks the human rights risks and impacts specifically related to the COVID-19 crisis, with 70% of companies unable to demonstrate taking even minimal action in this area.



## 5. Results by sector

### Agricultural Products

Company Name	Governance and policy commitment	Identifying and assessing risks	Integrating findings and taking appropriate action (health and safety & livelihood)	Purchasing decisions	Remedies and grievance mechanisms	Responded to survey
Aeon						✓
Ahold Delhaize						✓
Alimentation Couche-Tard						✗
Amazon						✓
Anheuser-Busch InBev						✓
Archer Daniels Midland (ADM)						✗
Asahi Group						✓
Associated British Foods						✓
BRF						✗
Brown-Forman Corporation						✗
Carlsberg						✓
Carrefour						✗
Coca-Cola Company						✓
Coles Group						✓
Compass Group						✓

## 5. Results by sector

### Agricultural Products

Company Name	Governance and policy commitment	Identifying and assessing risks	Integrating findings and taking appropriate action (health and safety & livelihood)	Purchasing decisions	Remedies and grievance mechanisms	Responded to survey
Conagra Brands	██████████	██████████	██████████	██████████	██████████	X
Constellation Brands	██████████	██████████	██████████	██████████	██████████	X
Costco	██████████	██████████	██████████	██████████	██████████	X
Danone	██████████	██████████	██████████	██████████	██████████	✓
Diageo	██████████	██████████	██████████	██████████	██████████	✓
FamilyMart Co., Ltd	██████████	██████████	██████████	██████████	██████████	✓
General Mills	██████████	██████████	██████████	██████████	██████████	✓
George Weston (Weston Foods & Loblaw)	██████████	██████████	██████████	██████████	██████████	X
Glencore	██████████	██████████	██████████	██████████	██████████	✓
Heineken	██████████	██████████	██████████	██████████	██████████	✓
Hormel Foods	██████████	██████████	██████████	██████████	██████████	✓
Kellogg's	██████████	██████████	██████████	██████████	██████████	X
Kerry Group	██████████	██████████	██████████	██████████	██████████	✓
Kirin Holdings	██████████	██████████	██████████	██████████	██████████	X
Kraft Heinz	██████████	██████████	██████████	██████████	██████████	X

## 5. Results by sector

### Agricultural Products

Company Name	Governance and policy commitment	Identifying and assessing risks	Integrating findings and taking appropriate action (health and safety & livelihood)	Purchasing decisions	Remedies and grievance mechanisms	Responded to survey
Kroger						✓
Kweichow Moutai						✗
Lindt & Sprungli						✗
Marks & Spencer						✓
McCormick						✗
McDonald's						✗
Mondelez International						✓
Monster Beverage						✗
Nestle						✓
PepsiCo						✓
Pernod Ricard						✗
SACI Falabella						✗
Seven & I Holding						✗
Shoprite Holdings						✗
Starbucks						✗

## 5. Results by sector

### Agricultural Products

Company Name	Governance and policy commitment	Identifying and assessing risks	Integrating findings and taking appropriate action (health and safety & livelihood)	Purchasing decisions	Remedies and grievance mechanisms	Responded to survey
Suntory Beverage & Food						✓
Sysco						✓
Target Corporation						✓
Tesco						✓
The Hershey Company						✓
Tyson Foods						✗
Unilever						✓
Walmart						✓
Wilmar International						✓
Woolworths Group						✓
Yili Group						✗
Yum! Brands						✗

## 5. Results by sector

### Apparel

We looked at 53 of the largest apparel companies in the world. Of these 53 companies, 28 (53%) responded to the survey. Where companies did not respond to the survey, the study is based only on information found in public documents.

Companies in the apparel sector tended to better perform on remedies and grievance mechanisms than on other areas, with 10% of companies disclosing information that showed advanced or comprehensive practices on committing to, providing for, or cooperating in, remediation for affected individuals and workers during and after the crisis, such as working with suppliers to establish a rapid response system for COVID-19 related grievances.

Among the sectors assessed in this study, the COVID crisis has been hitting apparel companies particularly hard, causing demand and supply shocks and affecting millions of suppliers and garment workers. Apparel companies performed slightly better than their peers in other sectors in the area of purchasing decisions, with 21% of companies demonstrating advanced or comprehensive practices. However, 77% of apparel companies demonstrated taking only minimal to no action at all to assess and address the human rights risks and impacts of their purchasing decisions during the crisis.



## 5. Results by sector

### Apparel

Company Name	Governance and policy commitment	Identifying and assessing risks	Integrating findings and taking appropriate action (health and safety & livelihood)	Purchasing decisions	Remedies and grievance mechanisms	Responded to survey
Adidas	██████████	██████████	██████████	██████████	██████████	✓
Aeon	██████████	██████████	██████████	██████████	██████████	✓
Amazon	██████████	██████████	██████████	██████████	██████████	✓
ANTA Sports Products	██████████	██████████	██████████	██████████	██████████	✗
Associated British Foods	██████████	██████████	██████████	██████████	██████████	✓
Burberry	██████████	██████████	██████████	██████████	██████████	✓
Capri Holdings	██████████	██████████	██████████	██████████	██████████	✗
Carter's	██████████	██████████	██████████	██████████	██████████	✗
Columbia Sportswear	██████████	██████████	██████████	██████████	██████████	✗
Costco	██████████	██████████	██████████	██████████	██████████	✗
Fast Retailing	██████████	██████████	██████████	██████████	██████████	✓
Foot Locker	██████████	██████████	██████████	██████████	██████████	✗
Gap Inc.	██████████	██████████	██████████	██████████	██████████	✗
Gildan Activewear	██████████	██████████	██████████	██████████	██████████	✓
Hanesbrands	██████████	██████████	██████████	██████████	██████████	✗

## 5. Results by sector

### Apparel

Company Name	Governance and policy commitment	Identifying and assessing risks	Integrating findings and taking appropriate action (health and safety & livelihood)	Purchasing decisions	Remedies and grievance mechanisms	Responded to survey
Heilan Group	██████████	██████████	██████████	██████████	██████████	X
Hennes & Mauritz	██████████	██████████	██████████	██████████	██████████	✓
Hermes International	██████████	██████████	██████████	██████████	██████████	✓
Hugo Boss	██████████	██████████	██████████	██████████	██████████	✓
Industria de Diseno Textil (Inditex)	██████████	██████████	██████████	██████████	██████████	✓
Kering	██████████	██████████	██████████	██████████	██████████	✓
Kohl's	██████████	██████████	██████████	██████████	██████████	X
L Brands	██████████	██████████	██████████	██████████	██████████	X
LPP	██████████	██████████	██████████	██████████	██████████	X
Lululemon Athletica	██████████	██████████	██████████	██████████	██████████	✓
LVMH Moet Henessy - Louis Vuitton	██████████	██████████	██████████	██████████	██████████	✓
Macy's	██████████	██████████	██████████	██████████	██████████	✓
Marks & Spencer	██████████	██████████	██████████	██████████	██████████	✓
Mr. Price	██████████	██████████	██████████	██████████	██████████	X
Next	██████████	██████████	██████████	██████████	██████████	✓

## 5. Results by sector

### Apparel

Company Name	Governance and policy commitment	Identifying and assessing risks	Integrating findings and taking appropriate action (health and safety & livelihood)	Purchasing decisions	Remedies and grievance mechanisms	Responded to survey
Nike						✓
Nordstrom						✗
Page Industries						✗
Pou Chen Corporation						✓
Prada						✓
Puma						✗
PVH Corporation						✓
Ralph Lauren Corporation						✓
Ross Stores						✗
SACI Falabella						✗
Salvatore Ferragamo						✓
Shenzhou International						✗
Skechers						✗
Tapestry						✗

## 5. Results by sector

### Apparel

Company Name	Governance and policy commitment	Identifying and assessing risks	Integrating findings and taking appropriate action (health and safety & livelihood)	Purchasing decisions	Remedies and grievance mechanisms	Responded to survey
Target Corporation						✓
Tesco						✓
The TJX Companies						✗
Under Armour						✗
VF Corporation						✓
Walmart						✓
Wesfarmers						✓
Youngor Group						✗
Zhejiang Semir Garment						✗

## 5. Results by sector

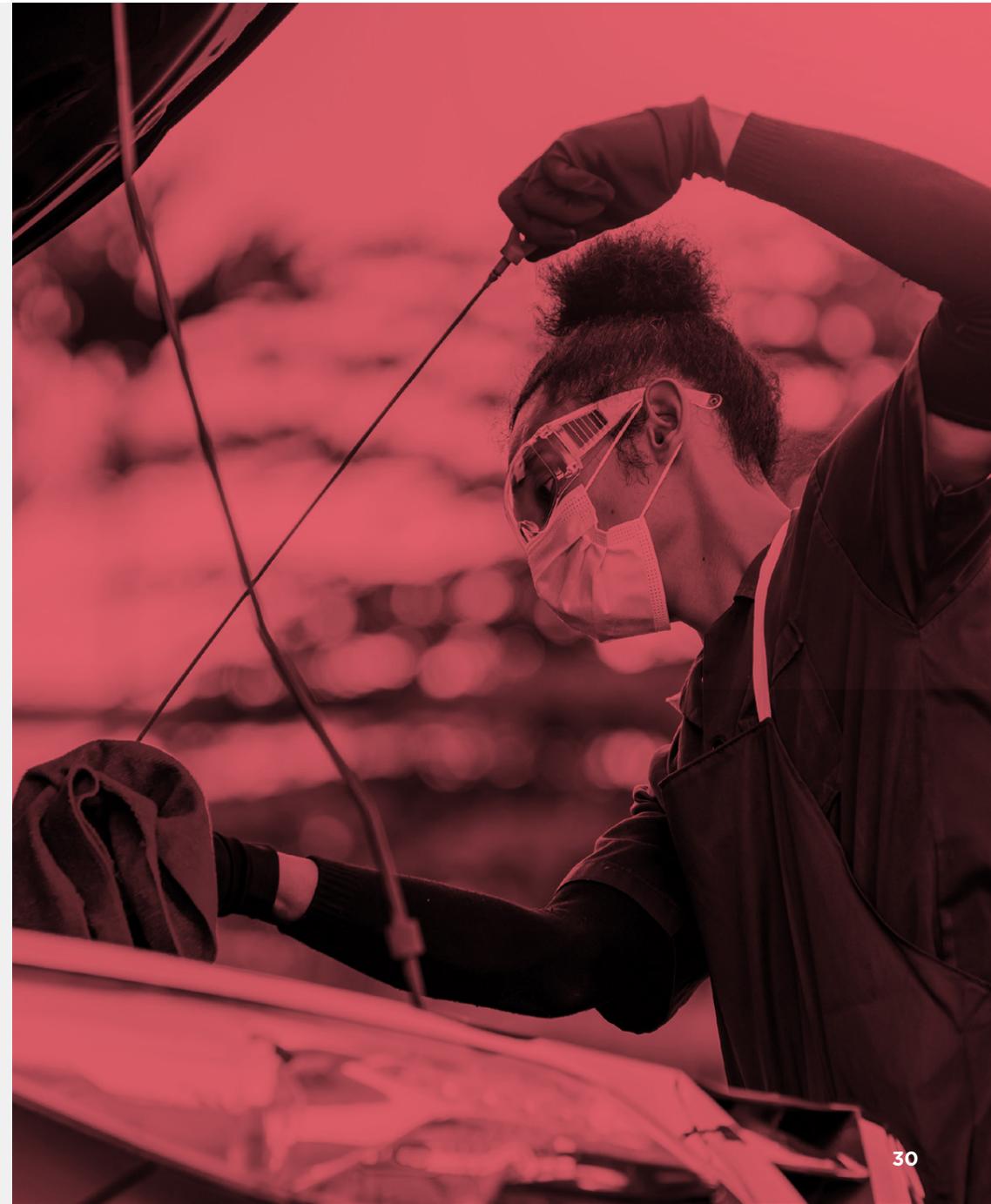
### Automotive manufacturing

We looked at 30 of the largest automotive manufacturing companies in the world. Of these 30 companies, 3 (10%) responded to the survey. Where companies did not respond to the survey, the study is based only on information found on public documents.

Overall, our findings show that automotive companies performed worse than other sectors on all human rights issues assessed in the study. Most of the companies in this sector disclosed little to no information on their approach to managing the human rights issues associated with the crisis, with no company demonstrating taking comprehensive actions on any of the measurement areas.

None of the companies assessed in this sector were able to demonstrate taking action on identifying and assessing the human rights risks and impacts specifically related to the COVID-19 crisis, and only one company demonstrated taking minimal action on assessing and addressing the human rights risks and impacts of their purchasing decisions during the crisis.

Similar to other sectors, out of the 5 measurement areas, automotive companies performed best on on remedies and grievance mechanisms. 70% of companies demonstrated taking minimal action on committing to providing for, or cooperating in, remediation for affected individuals and workers during and after the COVID-19 crisis.



## 5. Results by sector

### Automotive

Company Name	Governance and policy commitment	Identifying and assessing risks	Integrating findings and taking appropriate action (health and safety & livelihood)	Purchasing decisions	Remedies and grievance mechanisms	Responded to survey
Anhui Jianghuai Automobile Group	██████████	██████████	██████████	██████████	██████████	X
BAIC Motor	██████████	██████████	██████████	██████████	██████████	X
BMW	██████████	██████████	██████████	██████████	██████████	X
BYD	██████████	██████████	██████████	██████████	██████████	X
Chongqing Changan Automobile Company	██████████	██████████	██████████	██████████	██████████	X
Daimler	██████████	██████████	██████████	██████████	██████████	✓
Dongfeng Motor Group	██████████	██████████	██████████	██████████	██████████	X
FAW Car Company	██████████	██████████	██████████	██████████	██████████	X
Fiat Chrysler Automobiles	██████████	██████████	██████████	██████████	██████████	X
Ford	██████████	██████████	██████████	██████████	██████████	X
Geely	██████████	██████████	██████████	██████████	██████████	X
General Motors Corporation	██████████	██████████	██████████	██████████	██████████	X
Great Wall Motor Company	██████████	██████████	██████████	██████████	██████████	X
Groupe PSA	██████████	██████████	██████████	██████████	██████████	X
Guangzhou Automobile Group	██████████	██████████	██████████	██████████	██████████	X

## 5. Results by sector

### Automotive

Company Name	Governance and policy commitment	Identifying and assessing risks	Integrating findings and taking appropriate action (health and safety & livelihood)	Purchasing decisions	Remedies and grievance mechanisms	Responded to survey
Honda Motor Company	██████████	██████████	██████████	██████████	██████████	X
Hyundai Motor Company	██████████	██████████	██████████	██████████	██████████	X
Kia Motors Corporation	██████████	██████████	██████████	██████████	██████████	X
Mahindra and Mahindra	██████████	██████████	██████████	██████████	██████████	X
Mazda Motor Corporation	██████████	██████████	██████████	██████████	██████████	X
Mitsubishi Motors Corporation	██████████	██████████	██████████	██████████	██████████	X
Nissan Motor Company	██████████	██████████	██████████	██████████	██████████	✓
Renault	██████████	██████████	██████████	██████████	██████████	X
SAIC Motor	██████████	██████████	██████████	██████████	██████████	X
Subaru	██████████	██████████	██████████	██████████	██████████	X
Suzuki Motor Corporation	██████████	██████████	██████████	██████████	██████████	X
Tata Motors	██████████	██████████	██████████	██████████	██████████	X
Tesla	██████████	██████████	██████████	██████████	██████████	X
Toyota Motor Corporation	██████████	██████████	██████████	██████████	██████████	X
Volkswagen	██████████	██████████	██████████	██████████	██████████	✓

## 5. Results by sector

### Extractives

We looked at 57 of the largest extractive companies in the world. Of these 57 companies, 26 (46%) responded to the survey. Where companies did not respond to the survey, the study is based only on information found in public documents.

As was the case for the other sectors assessed, extractive manufacturing companies performed better on remedies and grievance mechanisms than any of the other areas. However, while companies took some action on committing to providing for, or cooperating in, remediation for affected individuals and workers during and after the COVID-19 crisis, 82% of them were only able to demonstrate taking minimal steps that did not involve working with their extractive business partners on these matters.

Just over a quarter (28%) of companies in this sector demonstrated taking basic to advanced action on integrating findings and taking action to ensure the health and safety of workers and to protect their livelihood. These actions include monitoring COVID-19 levels of sickness and self-isolation across its workforce as well as addressing the health and safety impacts on vulnerable workers.



## 5. Results by sector

### Extractives

Company Name	Governance and policy commitment	Identifying and assessing risks	Integrating findings and taking appropriate action (health and safety & livelihood)	Purchasing decisions	Remedies and grievance mechanisms	Responded to survey
Anglo American						✓
Anhui Conch Cement						✗
ArcelorMittal						✓
Barrick Gold Corporation						✗
BHP Group						✓
BP						✓
Canadian Natural Resources						✗
Chevron Corporation						✓
China National Offshore Oil Corporation (CNOOC Group)						✗
China Petroleum and Chemical Corporation Limited (Sinopec)						✗
China Shenhua Energy						✗
Coal India						✗
ConocoPhillips						✗
Devon Energy Corp						✗
Ecopetrol						✗

## 5. Results by sector

### Extractives

Company Name	Governance and policy commitment	Identifying and assessing risks	Integrating findings and taking appropriate action (health and safety & livelihood)	Purchasing decisions	Remedies and grievance mechanisms	Responded to survey
ENEOS Holdings						✓
ENI						✓
EOG Resources						✗
Equinor						✗
Exxon Mobil						✗
Freeport-McMoRan						✓
Gazprom						✓
Glencore						✓
Grupo Mexico						✓
HeidelbergCement						✓
INPEX						✗
LafargeHolcim						✓
Lukoil						✗
Marathon Oil						✗
Newmont Corporation						✓
Nippon Steel Corporation						✗

## 5. Results by sector

### Extractives

Company Name	Governance and policy commitment	Identifying and assessing risks	Integrating findings and taking appropriate action (health and safety & livelihood)	Purchasing decisions	Remedies and grievance mechanisms	Responded to survey
Nornickel	■ ■ ■ ■ ■	■ ■ ■ ■ ■	■ ■ ■ ■ ■		■ ■ ■ ■ ■	X
Novolipetsk Steel	■ ■ ■ ■ ■	■ ■ ■ ■ ■	■ ■ ■ ■ ■		■ ■ ■ ■ ■	✓
Occidental Petroleum	■ ■ ■ ■ ■	■ ■ ■ ■ ■	■ ■ ■ ■ ■		■ ■ ■ ■ ■	✓
Oil and Natural Gas Corporation (ONGC)	■ ■ ■ ■ ■	■ ■ ■ ■ ■	■ ■ ■ ■ ■		■ ■ ■ ■ ■	X
OMV	■ ■ ■ ■ ■	■ ■ ■ ■ ■	■ ■ ■ ■ ■		■ ■ ■ ■ ■	X
PetroChina	■ ■ ■ ■ ■	■ ■ ■ ■ ■	■ ■ ■ ■ ■		■ ■ ■ ■ ■	X
Petroleo Brasileiro (Petrobras)	■ ■ ■ ■ ■	■ ■ ■ ■ ■	■ ■ ■ ■ ■		■ ■ ■ ■ ■	✓
Phillips 66	■ ■ ■ ■ ■	■ ■ ■ ■ ■	■ ■ ■ ■ ■		■ ■ ■ ■ ■	X
POSCO	■ ■ ■ ■ ■	■ ■ ■ ■ ■	■ ■ ■ ■ ■		■ ■ ■ ■ ■	X
PTT	■ ■ ■ ■ ■	■ ■ ■ ■ ■	■ ■ ■ ■ ■		■ ■ ■ ■ ■	✓
Repsol	■ ■ ■ ■ ■	■ ■ ■ ■ ■	■ ■ ■ ■ ■		■ ■ ■ ■ ■	✓
Rio Tinto	■ ■ ■ ■ ■	■ ■ ■ ■ ■	■ ■ ■ ■ ■		■ ■ ■ ■ ■	✓
Rosneft	■ ■ ■ ■ ■	■ ■ ■ ■ ■	■ ■ ■ ■ ■		■ ■ ■ ■ ■	✓
Royal Dutch Shell	■ ■ ■ ■ ■	■ ■ ■ ■ ■	■ ■ ■ ■ ■		■ ■ ■ ■ ■	X
Sasol	■ ■ ■ ■ ■	■ ■ ■ ■ ■	■ ■ ■ ■ ■		■ ■ ■ ■ ■	✓

## 5. Results by sector

### Extractives

Company Name	Governance and policy commitment	Identifying and assessing risks	Integrating findings and taking appropriate action (health and safety & livelihood)	Purchasing decisions	Remedies and grievance mechanisms	Responded to survey
Saudi Aramco	██████████	██████████	██████████		██████████	X
Severstal	██████████	██████████	██████████		██████████	✓
Siam Cement (SCG)	██████████	██████████	██████████		██████████	X
Suncor Energy	██████████	██████████	██████████		██████████	X
Surgutneftegaz	██████████	██████████	██████████		██████████	X
TATNEFT	██████████	██████████	██████████		██████████	X
Teck Resources	██████████	██████████	██████████		██████████	✓
Total	██████████	██████████	██████████		██████████	✓
UltraTech Cement	██████████	██████████	██████████		██████████	X
Vulcan Materials Company	██████████	██████████	██████████		██████████	X
Woodside Petroleum	██████████	██████████	██████████		██████████	✓

## 5. Results by sector

### ICT manufacturing

We looked at 44 of the largest ICT manufacturing companies in the world. Of these 44 companies, 22 (50%) responded to the survey. Where companies did not respond to the survey, the study is based only on information found on public documents.

Companies in this sector performed relatively well on remedies and grievance mechanisms, with 98% demonstrating taking some action in this area. However, only 11% of ICT manufacturing companies demonstrated advanced or comprehensive practices, through commitments to work with suppliers to provide for, or cooperate in, remediation for affected individuals and workers during and after the crisis.

When it comes to integrating findings and taking appropriate action on health and safety and worker livelihood, more than half of companies in this sector disclosed information showing minimal actions, and 20% demonstrated basic to advanced practices, such as working with suppliers to monitor levels of COVID-19 sickness and self-isolation across the workforce.

ICT manufacturing companies did not perform well on purchasing practices, with just under a third demonstrating minimal action and only 2 companies demonstrating advanced practices, such as taking mitigation measures towards suppliers negatively impacted by changing demand.



## 5. Results by sector

### ICT Manufacturing

Company Name	Governance and policy commitment	Identifying and assessing risks	Integrating findings and taking appropriate action (health and safety & livelihood)	Purchasing decisions	Remedies and grievance mechanisms	Responded to survey
Amazon	██████████	██████████	██████████	██████████	██████████	✓
Amphenol	██████████	██████████	██████████	██████████	██████████	✗
Analog Devices	██████████	██████████	██████████	██████████	██████████	✗
Apple	██████████	██████████	██████████	██████████	██████████	✗
Applied Materials	██████████	██████████	██████████	██████████	██████████	✗
ASML	██████████	██████████	██████████	██████████	██████████	✗
BOE Technology Group	██████████	██████████	██████████	██████████	██████████	✗
Broadcom	██████████	██████████	██████████	██████████	██████████	✗
Canon	██████████	██████████	██████████	██████████	██████████	✓
Cisco	██████████	██████████	██████████	██████████	██████████	✓
Corning	██████████	██████████	██████████	██████████	██████████	✓
Dell	██████████	██████████	██████████	██████████	██████████	✓
Ericsson	██████████	██████████	██████████	██████████	██████████	✓
Hewlett Packard Enterprise	██████████	██████████	██████████	██████████	██████████	✓
Hitachi	██████████	██████████	██████████	██████████	██████████	✗

## 5. Results by sector

### ICT Manufacturing

Company Name	Governance and policy commitment	Identifying and assessing risks	Integrating findings and taking appropriate action (health and safety & livelihood)	Purchasing decisions	Remedies and grievance mechanisms	Responded to survey
Hon Hai Precision Industry Co., Ltd. (Foxconn)						✓
HOYA Corporation						✓
HP						✓
Infineon Technologies						✗
Intel						✓
Keyence Corporation						✗
Kyocera Corporation						✗
Lam Research						✗
Largan Precision						✗
Microchip Technology						✗
Micron Technology						✓
Microsoft						✓
Murata Manufacturing						✓
Nintendo						✓
Nokia						✗

## 5. Results by sector

### ICT Manufacturing

Company Name	Governance and policy commitment	Identifying and assessing risks	Integrating findings and taking appropriate action (health and safety & livelihood)	Purchasing decisions	Remedies and grievance mechanisms	Responded to survey
Nvidia	■ ■ ■ ■ ■	■ ■ ■ ■ ■	■ ■ ■ ■ ■	■ ■ ■ ■ ■	■ ■ ■ ■ ■	✓
NXP Semiconductors	■ ■ ■ ■ ■	■ ■ ■ ■ ■	■ ■ ■ ■ ■	■ ■ ■ ■ ■	■ ■ ■ ■ ■	✗
Panasonic Corporation	■ ■ ■ ■ ■	■ ■ ■ ■ ■	■ ■ ■ ■ ■	■ ■ ■ ■ ■	■ ■ ■ ■ ■	✓
Qualcomm	■ ■ ■ ■ ■	■ ■ ■ ■ ■	■ ■ ■ ■ ■	■ ■ ■ ■ ■	■ ■ ■ ■ ■	✓
Samsung Electronics	■ ■ ■ ■ ■	■ ■ ■ ■ ■	■ ■ ■ ■ ■	■ ■ ■ ■ ■	■ ■ ■ ■ ■	✓
SK Hynix	■ ■ ■ ■ ■	■ ■ ■ ■ ■	■ ■ ■ ■ ■	■ ■ ■ ■ ■	■ ■ ■ ■ ■	✓
Skyworks Solutions	■ ■ ■ ■ ■	■ ■ ■ ■ ■	■ ■ ■ ■ ■	■ ■ ■ ■ ■	■ ■ ■ ■ ■	✗
Sony	■ ■ ■ ■ ■	■ ■ ■ ■ ■	■ ■ ■ ■ ■	■ ■ ■ ■ ■	■ ■ ■ ■ ■	✗
TE Connectivity	■ ■ ■ ■ ■	■ ■ ■ ■ ■	■ ■ ■ ■ ■	■ ■ ■ ■ ■	■ ■ ■ ■ ■	✗
Texas Instruments	■ ■ ■ ■ ■	■ ■ ■ ■ ■	■ ■ ■ ■ ■	■ ■ ■ ■ ■	■ ■ ■ ■ ■	✗
Tokyo Electron	■ ■ ■ ■ ■	■ ■ ■ ■ ■	■ ■ ■ ■ ■	■ ■ ■ ■ ■	■ ■ ■ ■ ■	✓
TSMC	■ ■ ■ ■ ■	■ ■ ■ ■ ■	■ ■ ■ ■ ■	■ ■ ■ ■ ■	■ ■ ■ ■ ■	✗
Walmart	■ ■ ■ ■ ■	■ ■ ■ ■ ■	■ ■ ■ ■ ■	■ ■ ■ ■ ■	■ ■ ■ ■ ■	✓
Western Digital	■ ■ ■ ■ ■	■ ■ ■ ■ ■	■ ■ ■ ■ ■	■ ■ ■ ■ ■	■ ■ ■ ■ ■	✓

## Governance and policy commitment

**QUESTION 1: Has the Company committed to respecting human rights in its COVID-19 response, and assigned this responsibility at the board level as well as in its day-to-day operations and business relationships?**

### Basic

- The Company has a publicly available statement committing it to respect human rights during the COVID-19 crisis.
- The Company indicates that it prohibits retaliation against workers or other stakeholders (including those that represent them) for raising human rights complaints or concerns during the COVID-19 crisis.
- The Company indicates the senior manager role(s) responsible for relevant human rights issues in the Company during the COVID-19 crisis.

### Advanced

- The Company has tasked a board member or board committee with specific governance oversight for human rights during the COVID-19 crisis.
- The Company indicates the senior manager role(s) responsible for relevant human rights issues in the Company's supply chain/business partners' operations during the COVID-19 crisis.

## Human rights due diligence

**QUESTION 2: Has the Company identified and assessed the human rights risks and impacts specifically related to the COVID-19 crisis in its operations and business relationships?**

### Basic

- The Company describes the process(es) used to identify and assess the human rights risks and impacts related to COVID-19 in its own operations.
- The Company describes how the risk identification and assessment process(es) includes consideration of risks and impacts on local communities and vulnerable groups (including women, migrant workers, older persons, disadvantaged racial or ethnic groups, and persons with underlying health conditions) in its own operations.
- The Company indicates that it has consulted with representatives of workers, local communities and vulnerable groups in its own operations. The company may provide a specific example to satisfy this criterion.

**Note:** This can include (but is not limited to) community representatives, legal representatives, trade unions, community-based organisations and civil society organisations, recognising the challenges of direct consultations during periods of required lockdowns/physical distancing.

## Advanced

- The Company describes the process(es) used to identify and assess the human rights risks and impacts related to COVID-19 in its supply chain/ business partners' operations.
- The Company describes how the risk identification and assessment process(es) includes consideration of risks and impacts on local communities and vulnerable groups (including women, migrant workers, older persons, disadvantaged racial or ethnic groups, and persons with underlying health conditions) in its supply chain/business partners' operations.

## Integrating assessment findings internally and taking appropriate action

**QUESTION 3a: Has the Company taken steps to ensure the health and safety of workers, addressing COVID-19 related risks and impacts in its own operations and business relationships?**

## Basic

- The Company describes how it facilitates remote working (where possible).
- The Company describes how it implements physical distancing protocols and provides PPE and hand-washing facilities.

- The Company describes how it addresses the health and safety impacts on vulnerable workers (including women, migrant workers, older persons, disadvantaged racial or ethnic groups, and persons with underlying health conditions in its own operations).

## Advanced

- The Company describes how it works with its suppliers/business partners to facilitate remote working (where possible).
- The Company describes how it works with its suppliers/business partners to implement physical distancing protocols and to provide PPE and hand-washing facilities.
- The Company has established channels for mental health support for workers during the COVID-19 crisis (at a minimum in own operations).
- The Company describes how it works with suppliers/business partners to address the health and safety impacts on vulnerable workers such as women, migrant workers, older persons, disadvantaged racial or ethnic groups, and persons with underlying health conditions in its supply chain/business partners' operations.

**QUESTION 3b: Has the Company taken steps to maintain the livelihoods of workers, including the most vulnerable workers, addressing COVID-19 related risks and impacts in its own operations and business relationships?**

**Basic**

- The Company describes how it provides paid sick leave for workers.
- The Company describes how it provides financial support for workers temporarily prevented from working. The company may provide a specific example to satisfy this criterion.
- The Company describes the steps it takes to avoid redundancies (including through the use of government schemes).
- The Company indicates that it provides notice and re-training for workers made redundant.
- The Company demonstrates how it plans to re-employ any workers made redundant. The company may provide a specific example to satisfy this criterion.

**Advanced**

- The Company describes how it works with its suppliers/business partners to provide paid sick leave for workers.

- The Company describes how it works with suppliers/business partners to provide financial support for workers temporarily prevented from working. The company may provide a specific example to satisfy this criterion.
- The Company describes how it encourages suppliers/business partners to consider redundancies as a last resort.
- The Company describes how it encourages suppliers/business partners to provide notice and offer retraining for workers made redundant.
- The Company describes how it encourages suppliers/business partners to develop plans to re-employ workers made redundant (if any). The company may provide a specific example to satisfy this criterion.

**QUESTION 3c: Has the company taken steps to track the actions taken to address COVID-19 related human rights risks and impacts?**

**Basic**

- The Company describes how it monitors COVID-19 levels of sickness and self-isolation across its workforce.
- The Company assesses the effectiveness of the actions it has taken on COVID-19.

## Advanced

- The Company works with its suppliers/business partners to monitor levels of COVID-19 sickness and self-isolation across the workforce.
- The Company works with its suppliers/business partners to assess the effectiveness of actions taken in relation to COVID-19.

## Performance: Company human rights practices during COVID-19

### **QUESTION 4: Has the Company assessed and addressed the human rights risks and impacts of its purchasing decisions during the COVID-19 crisis?**

#### Basic

- The Company honours orders placed before the COVID-19 crisis, including not re-negotiating price or payment terms.
- The company assesses the human rights risk(s) and impacts of any changes in purchasing brought about by COVID-19, including risks and impacts on workers and small businesses in the supply chain. The company may provide a specific example to satisfy this criterion.

#### Advanced

- The Company takes steps to maintain demand. The company may provide a specific example to satisfy this criterion.
- The Company takes mitigation measures towards suppliers negatively impacted by changing demand (such as providing affected suppliers with access to low-cost financing or other support). The company may provide a specific example to satisfy this criterion.

*\*This topic does not apply to extractive companies. For this sector, instead of ‘suppliers’ the study focuses on what are referred to as ‘extractive business partners,’ defined as operational level contractors (including on-site and off-site contractors involved in operations, such as those involved in resettlement operations or other similar operations off-site, contracted security providers, etc.) and joint ventures or similar contractual arrangements with multiple parties to carry out exploration and/or production. The question on purchasing decisions does not include the extractive sector.*

## Remedies and grievance mechanisms

**QUESTION 5: Has the Company committed to providing for, or cooperating in, remediation for affected individuals and workers during and after the COVID-19 crisis?**

### Basic

- The Company has a grievance mechanism(s)/channel(s) through which workers can raise complaints or concerns related to COVID-19 without retaliation.
- The Company has a rapid response system to respond to any grievances related to COVID-19.

### Advanced

- The Company works with suppliers/business partners to ensure that workers have access to a grievance mechanism(s)/channel(s) through which they can raise COVID-19 related complaints or concerns without retaliation, OR the Company grants supply chain workers/workers in business partners' operations access to its own channel(s)/mechanism(s), through which they can raise COVID-19 related complaints or concerns without retaliation about the Company's suppliers. The company may provide a specific example to satisfy this criterion.

- The Company works with suppliers/business partners to put in place a rapid response system to respond to any grievances related to COVID-19. The company may provide a specific example to satisfy this criterion.

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