



Corporate Human
Rights Benchmark

Corporate Human Rights Benchmark

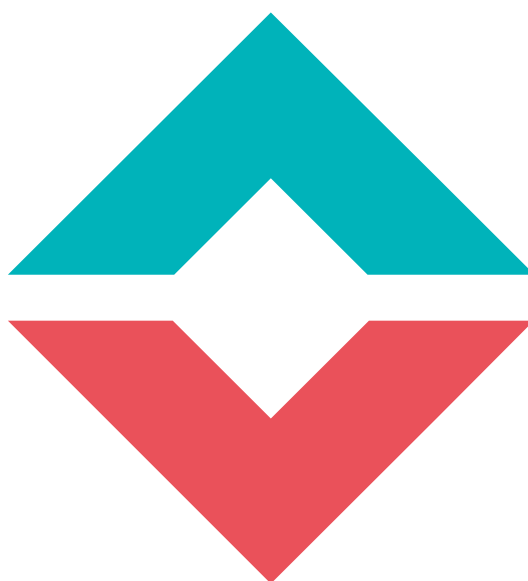
April 2019

CHRB Core UNGP Indicator Assessment

For companies in
all sector

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Introduction

This document sets out a stand-alone CHRB methodology to assess how companies are approaching their responsibilities to respect human rights through the implementation of the UN Guiding Principles on Business and Human Rights (UNGPs).

The **Corporate Human Rights Benchmark Ltd (CHRB)**, is a not for profit company guided by an Advisory Council made of eight organisations and three independent advisors (see [CHRB website](#) for more detail). The CHRB exists to develop and create publicly available benchmarks on corporate human rights performance, to engage with stakeholders to ensure the research drives better decision making in companies, investors, consumers and governments, and to support the respect for human rights through responsible business practices.



Over several years and iterations of benchmarking companies in the Agricultural Products, Apparel and Extractives sectors, the CHRB has established itself as a respected voice in the space and have gained broad acceptance from benchmarked companies, investors and civil society.

The CHRB has focused on high-risk sectors and the full methodology assesses companies across six themes and dozens of indicators. This provides a proxy for human rights performance that ranks companies against their peers. However, the research and engagement processes are time intensive and this limits the scale of the research.

In addition, many companies, even the largest in the world, are not yet willing or able to disclose sufficient information to make informed comparisons of their human rights performance across all our measurement themes. Companies will still be assessed against the full methodology, but we recognise that smaller companies may struggle with the levels of disclosures expected by CHRB in the short term.

In the background, CHRB sees the expansion of government desire to understand and track the levels of implementation of the UNGPs within their domestic businesses; a key indicator of the

fulfilment of their own National Action Plans on human rights.

Linked to the points above, CHRB has produced a ‘Core UNGP Indicator List’, taken from the full methodology, which are set out in this document. It is designed to allow parties to take a quick snapshot of a company’s approach to human rights management and whether they are implementing the relevant requirements of the Guiding Principles.

Respecting human rights should be the bedrock of a company’s contribution to the sustainable development agenda. These indicators should therefore be viewed as a ‘floor’, or a pre-qualifier, for any subsequent assessment against the Sustainable Development Goals.

CHRB aims to use these indicators to expand the scope and scale of our research to more companies across any sector and also aim to integrate them into future SDG related benchmarking with the World Benchmarking Alliance. In 2019 and beyond, CHRB also hopes to enable third parties, including governments, to make relatively rapid assessments of the level of UNGP adoption by their domestic businesses, in order to contribute to the debates around National Action Plans and the need for additional legislation or binding agreements.

Key Definitions

A full glossary is available in the full [CHRB Methodology](#), however the following terms are critical to understanding the methodology:

Human rights - Basic international standards aimed at securing dignity and equality for all. Every human being is entitled to enjoy them without discrimination. They include the rights contained in the International Bill of Human Rights. They also include the principles concerning fundamental rights at work set out in the International Labour Organization’s Declaration on Fundamental Principles and Rights at Work.

UN Guiding Principles on Business and Human Rights (UN Guiding Principles/UNGPR) - A set of 31 principles that set out the respective roles of States and companies in ensuring that companies respect human rights in their business activities and through their business relationships. The [UN Guiding Principles](#) were endorsed by the United Nations Human Rights Council in 2011.

Workers - An individual performing work for a company, regardless of the existence or nature of any contractual relationship with that company.

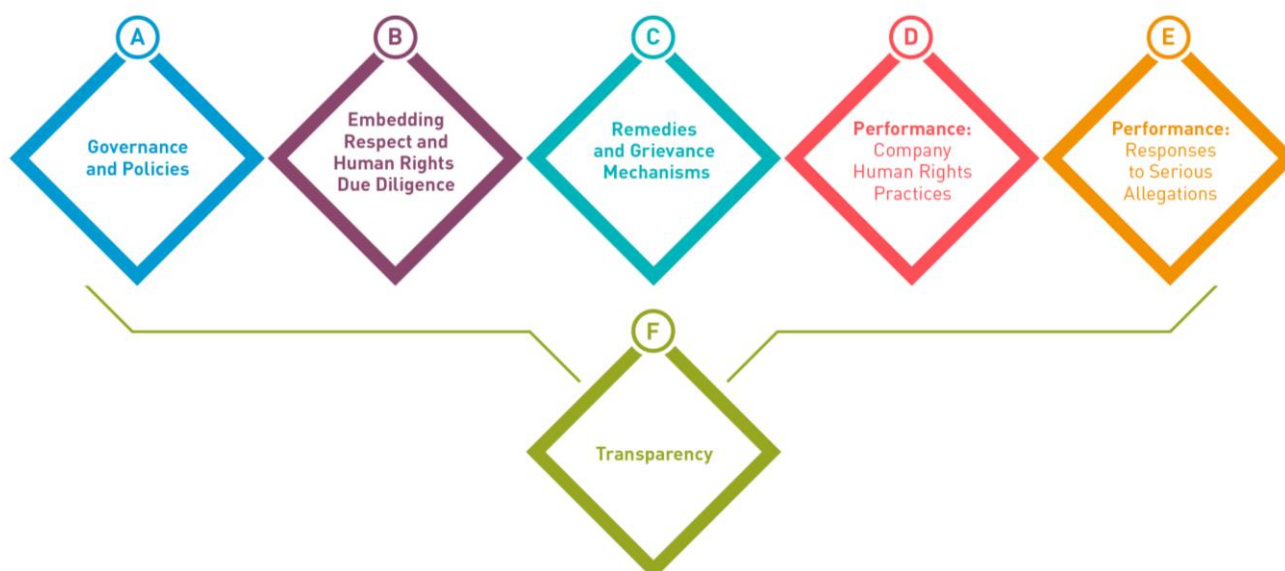
Business relationships - The relationships a company has with business partners, entities in its value chain and any other State or non- State entity directly linked to its operations, products or services. They include indirect relationships in its value chain, beyond the first tier, and minority as well as majority share-holding positions in joint ventures.

Suppliers – Refers to direct, contracted or tier 1 suppliers.

Supply chain - Refers to all supply chain business relationships, including both direct and indirect, tier 1 and beyond.

Human rights due diligence – An ongoing risk management process that a reasonable and prudent company needs to follow in order to identify, prevent, mitigate and account for how it addresses its adverse human rights impacts. As set out in the UN Guiding Principles 17-21, this includes four key steps: assessing actual and potential human rights impacts; integrating and acting on the findings; tracking responses; and communicating about how impacts are addressed.

The CHRB Measurement Themes and Indicators



Selection of Indicators

The full CHRB Methodology covers six Themes, is grounded in the UNGPs and covers over 80 indicators.

To develop a core-indicator list, CHRB focused on the non-industry specific indicators that dealt with three key areas of the UNGPs; high level commitments, human rights due diligence and access to remedy.

This limited it to Themes A, B and C from the Full Methodology, excluding the CHRB performance indicators concerning key human rights risks,

enabling factors and responses to serious allegations of human rights impacts.

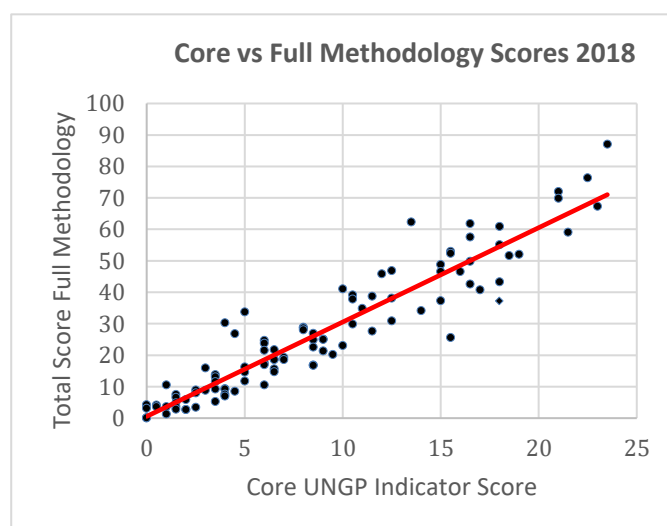
Of the 31 indicators in Themes A-C in the full methodology, CHRB has narrowed the selection down to 13 core UNGP indicators as detailed below.

The CHRB indicators follow a set structure, awarding either zero, half, one, one point five, or two points depending on whether the indicator requirements are assessed to have been met.

CODE	TITLE
Theme A. Governance and Policy Commitments	
A.1.1	Commitment to respect human rights
A.1.2	Commitment to respect the human rights of workers
A.1.4	Commitment to engage with stakeholders
A.1.5	Commitment to remedy
Theme B. Embedding respect and Human Rights Due Diligence	
B.2.1	HRDD - Identifying: Processes and triggers for identifying human rights risks and impacts
B.2.2	HRDD - Assessing: Assessment of risks and impacts identified (salient risks and key industry risks)
B.2.3	HRDD - Integrating and Acting: Integrating assessment findings internally and taking appropriate action
B.2.4	HRDD - Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts
B.2.5	HRDD - Reporting: Accounting for how human rights impacts are addressed
B.1.1	Embedding - Responsibility and resources for day-to-day human rights functions
C. Remedies and Grievance Mechanisms	
C.1	Grievance channels/mechanisms to receive complaints or concerns from workers
C.2	Grievance channels/mechanisms to receive complaints or concerns from external individuals and communities
C.7	Remediating adverse impacts and incorporating lessons learned

These 13 indicators are thought to most closely reflect the headline requirements of the UNGPs, while being few enough to enable a company review in approximately one day of research.

While these are not ‘performance’ indicators as such, but how companies score against the core UNGP indicators is closely correlated to their scores against the full methodology assessment, as shown in the comparison graph for the 2018 data (right).



Guide to Researching Indicators and Scoring

CHRB and its research partners have built up several years of experience in interpreting and using the indicators. Some key guidance is included below to support those using the core indicators:

How to Read a CHRB Indicator

A typical CHRB indicator follows a specific structure. Many of the terms in the Methodology have a specific definition that is drawn from international standards and industry-specific sources wherever possible. Please see the list of Sources Referenced in Annexes 5 and 6 of the full Methodology for more detail. In addition to the typical structure of a CHRB indicator, there are certain rules built into CHRB indicators:

- **AND's and OR's:** Most CHRB indicators operate using 'OR' and 'AND' rules. Where two or more requirements are separated by 'OR' in bold, companies being benchmarked are required to complete one of the options listed. Where two or more requirements are separated by 'AND' in bold, companies being benchmarked are required to complete both or all of the options listed in order to obtain a full point. A company can score half points if they meet at least one of the requirements where there is an 'AND'.
- **Scoring:** In order to meet the requirements of a Score 2, the requirements of a Score 1 must also be met.
- **Timeframe for examples:** Some CHRB indicators require an example of the specific issue in question to be made public. In these instances, and unless otherwise specified in the indicator description, the timeframe within which such examples occurred is within three years of the start of the annual CHRB research cycle.

Example Indicator

Each indicator has a title, sources (i.e. international standards that relate to the indicator), an overall description, specific scoring requirements for Score 1 and Score 2, a list of what points can be scored on that indicator and, if relevant, guidance for researchers.

In Indicator C.7, a company can potentially score 0, 1, 1.5 and 2 points.

C.7	
Remediating adverse impacts and incorporating lessons learned	
Source: UNGP 19, 22 and 31; UNGPRF C6, C6.4 and C6.5; GRI 103-2 and 413-2	
The Company provides for or cooperates in remediation to victims where it has identified that it has caused or contributed to adverse human rights impacts (or others have brought such information to the Company's attention, such as through its grievance channel(s)/mechanism(s)). It also incorporates the lessons learned from remediation approaches into its channel(s)/mechanism(s) and processes to prevent future impacts.	
Score 1	Score 2
For adverse human rights impacts which it has caused or to which it has contributed, the Company describes the approach it took to provide or enable a timely remedy for victims, OR if no adverse impacts have been identified then the Company describes the approach it would take to provide or enable timely remedy for victims.	For adverse human rights impacts which it has caused or to which it has contributed, the Company also describes changes to systems and procedures to prevent similar adverse impacts in the future OR if no adverse impacts have been identified then the Company describes the approach it would take to review and change systems and procedures to prevent similar adverse impacts in the future. AND The Company provides an evaluation of the effectiveness of the grievance channel(s)/mechanism(s).
Points Available: 0, 0.5, 1, 1.5, 2*	

Note that in Score 1, there is an 'OR' wording. As such, a company meeting either of the two requirements in Score 1 can achieve 1 point. They can not score 0.5 points, even by meeting some of, but not all of, both the score 1 requirement.

In Score 2, there is an 'AND' wording. As such, if the company has already met either of the requirements to get a score of 1, it then must meet **both** requirements under Score 2 to get the full 2 points. If a company only meets one half of the Score 2 requirements, it can get 1.5 points, assuming it fully met the requirements for Score 1.

In order to give credit to companies who are disclosing some information (and to distinguish them from those who disclose nothing), companies who meet one or more criteria on Score 2, without meeting all criteria on Score 1, may be awarded a half-point. But scores above 0.5 pts require all of Score 1 criteria to be met.

Evidence for Research

CHRB only uses publicly available information coming from a company’s websites, their formal financial and non-financial reporting or other public documents, plus statements, such as those related to its policy commitments. These could be codes of conduct, policies, values, guidelines, FAQs and other related documents. The CHRB will also consider reports, such as annual, CSR, sustainability reports, or human rights reports if these are available, or other reports written for other purposes if these contain information applicable to CHRB indicators.

Indicators in Detail

From Theme A - Governance and Policy Commitments

These indicators aim to assess the extent to which a company acknowledges its responsibility to respect human rights, and how it formally incorporates this into publicly available statements of policy. A policy commitment is a statement approved at the highest levels of the business that shows the company is committed to respecting human rights and communicates this internally and externally. It sets the “tone at the top” of the company that is needed to continually drive respect for human rights into the core values and culture of the business. It indicates that top management considers respect for human rights to be a minimum standard for conducting business with legitimacy; it sets out their expectations of how staff and business relationships should act, as well as what others can expect of the company. It should trigger a range of other internal actions that are necessary to meet the commitment in practice.

There are four indicators taken from the full CHRB Methodology Theme A as follows:

Theme A. Governance and Policy Commitments

- A.1.1** Commitment to respect human rights
- A.1.2** Commitment to respect the human rights of workers
- A.1.4** Commitment to engage with stakeholders
- A.1.5** Commitment to remedy

General Research Guidance for Theme A:

Formal Policies

The commitments mentioned in this section have to be part of ‘formal policies’. Formal policies are those signed by the Board and/or found in policy and governance sections of websites. If the only evidence found is in a CSR report then it will need to be clearly described that it is part of the company policy (or give any other evidence of top level sign off).

A commitment to uphold rights "where legally required", or a statement that the company "recognises legal requirements" in respect of a particular right **does not** equate to the commitment CHRB seeks.

A commitment to uphold rights "as far as possible under law" may be accepted as we cannot expect companies to commit to breaking the law but we **do** expect them to do everything they can to respect the rights of the people they can impact and the commitments should reflect this approach.

Policy Commitment – Wording

Whenever a CHRB indicator requires companies to make a “**commitment**”, researchers should look for an **explicit** commitment or any form of **promise** that companies **will uphold the rights** described in the international instruments and standards listed.

The type of wording that CHRB would typically accept as a clear expression of commitment includes the following:

- Commits to respect XX convention
- We adhere to the XX convention
- We uphold the XX right/convention, etc.
- We support the right to XX
- We are committed to respecting the rights under the XX convention
- We fully endorse and support the principles enshrined in the XX convention
- We recognise our obligation to respect XX
- The company is committed to implementing the XX Convention

The examples below are considered to be vague / weak in relation to a firm ‘commitment’:

- Consistent with XX
- In line with
- Informed by
- Striving to ensure rights are upheld
- Recognises the principles of XX
- Aligned with
- Based on
- In accord with
- We base our requirements on XXX (‘basing requirements on’ is not a commitment)

A.1.1 Commitment to respect human rights	
Source: UNGP 11 and 12; UNGPRF A1; GRI 103-2	
The Company publicly commits to respecting human rights across its activities. It must be clear the commitment relates to all internationally recognised human rights, rather than to only one or more selected human rights. This only considers commitments to avoid adverse human rights impacts and does not include philanthropic commitments.	
Score 1	Score 2
The Company has a publicly available statement of policy committing it to respect human rights OR the ten principles of the UN Global Compact (as principles 1 and 2 include a commitment to respect human rights) OR the rights under the Universal Declaration of Human Rights (UDHR) OR the International Bill of Human Rights.	The Company’s publicly available statement of policy also commits it to: the UN Guiding Principles on Business and Human Rights OR the OECD Guidelines for Multinational Enterprises.
Points Available: 0, 0.5, 1, 1.5, 2*	

A.1.2 Commitment to respect the human rights of workers	
Source: UNGP 12 and 16c, UNGPRF A1 and GRI 103-2	
<p>The Company publicly commits to respecting the principles concerning fundamental rights at work in the eight ILO core conventions as set out in the Declaration on Fundamental Principles and Rights at Work (see Figure 14), together with those human rights of workers that are particularly relevant to the industry. It also has a publicly available statement of policy committing it to respect the human rights of workers in its business relationships, and in particular respecting the rights of workers in its supply chain.</p>	
Score 1	Score 2
<p>The Company has a publicly available statement of policy committing it to respecting the human rights that the ILO has declared to be fundamental rights at work (ILO Core Labour Standards) OR the Company has a publicly available statement of policy committing it to respecting the ten principles of the UN Global Compact (principles 3 to 6 are based on the ILO Declaration on Fundamental Principles and Rights at Work).</p> <p>AND, in addition to one of the above, the Company's policy commitment(s) also states that it expects its suppliers to commit to respecting each of the ILO core labour standards and explicitly lists them in that commitment.</p>	<p>The Company's policy statement on the ILO Core Labour Standards includes explicit commitments to respect: freedom of association and the right to collective bargaining and the rights not to be subject to forced labour, child labour or discrimination in respect of employment and occupation. AND the Company's publicly available statement of policy also commits it to respecting the ILO conventions on labour standards on working hours and the health and safety of its workers AND the Company's policy commitment(s) also states that it expects its suppliers to commit to respecting the ILO conventions on labour standards on working hours and the health and safety of their workers.</p>
Points Available: 0, 0.5, 1, 1.5, 2	
Guidance for Researchers:	
<ul style="list-style-type: none"> • <i>The ILO Declaration on Fundamental Principles and Rights at Work covers the following four fundamental principles and rights at work, laid out in eight conventions:</i> <ul style="list-style-type: none"> ○ <i>Freedom of association and the effective recognition of the right to collective bargaining (Convention No. 87 & No. 98)</i> ○ <i>Elimination of all forms of forced or compulsory labour (Convention No. 29 & No. 105)</i> ○ <i>Effective abolition of child labour (Convention No. 138 & No. 182)</i> ○ <i>Elimination of discrimination in respect of employment and occupation (Convention No. 100 & No. 111)</i> • <i>Additional ILO labour standards:</i> <ul style="list-style-type: none"> ○ <i>Working Hours (Conventions 1, 14 & 106)</i> • <i>The public statement of commitment needs to be signed off by the Board.</i> • <i>Inclusion in a Human Rights policy will be taken as implying sign off by the Board.</i> • <i>The content of a Global Framework agreement with a trade union can be used as evidence of corporate commitment.</i> • <i>Disclosing the numbers of employees unionised is not considered a proxy for having a global policy commitment to respecting freedom of association.</i> • <i>Collective bargaining: talking to employees does not count as a commitment to respecting the right to collective bargaining. For example, a statement like "the company seeks to have communications policies with its employees and their representatives in compliance with local regulations" is considered insufficient.</i> 	

A.1.4 Commitment to engage with stakeholders	
<i>Source: UNGP 12 and 18b; UNGPRF C2</i>	
The Company publicly commits to engage with its stakeholders, including potentially and actually affected stakeholders, and/or their legitimate representatives.	
Score 1	Score 2
The Company has a publicly available statement of policy committing it to engage with its potentially and actually affected stakeholders, including in local communities where relevant OR there is evidence that the Company regularly engages with potentially and actually affected stakeholders and/or their legitimate representatives.	The Company's publicly available statement of policy also commits it to engaging with affected stakeholders and/or their legitimate representatives in the development or monitoring of its human rights approach OR there is evidence that the Company regularly engages with potentially and actually affected stakeholders and/or their legitimate representatives in the development or monitoring of its human rights approach.
Points Available: 0, 0.5, 1, 1.5, 2*	
Guidance for Researchers: <ul style="list-style-type: none"> • <i>Engagement with potentially and actually affected stakeholders means engaging in a dialogue with the stakeholders who might be, or are, impacted by the company's activities and/or with their legitimate representatives. Depending on the nature of the company's operations, this can include (but is not limited to) workers, their families, local communities and any other person or group of people whose life and environment might be impacted. Legitimate representatives are those that the affected or potentially affected stakeholders have asked to represent them. This can include (but is not limited to) community representatives, legal representatives and trade unions, community-based organisations and civil society organisations. Evidence of engagement in the last two years will count as evidence of regular engagement.</i> • <i>The commitment needs to be in a formal public document.</i> 	

A.1.5 Commitment to Remedy	
<i>Source: UNGP 22; UNGPRF C6</i>	
The Company publicly commits to providing for or cooperating in remediation for affected individuals, workers and communities through legitimate processes (including judicial and non-judicial mechanisms, as appropriate), where it identifies that it has caused or contributed to adverse impacts.	
Score 1	Score 2
The Company has a publicly available statement of policy committing it to remedy the adverse impacts on individuals, workers and communities that it has caused or contributed to.	The policy commitment also includes a commitment to the following: Working with its suppliers to remedy adverse impacts which are directly linked to its operations, products or services through the suppliers' own mechanisms or through collaborating with its suppliers on the development of third party non-judicial remedies AND the Company's policy commitment recognises its approach to remedy should not obstruct access to other remedies, or it includes commitments to collaborating in initiatives that provide access to remedy.
Points Available: 0, 0.5, 1, 1.5, 2*	
Guidance for Researchers: <ul style="list-style-type: none"> • <i>The commitment needs to be in a formal public document.</i> • <i>CHRB is looking for an actual explicit commitment to remedy, therefore a statement that "a complaints system is a sign of commitment to remedy" is considered insufficient.</i> 	

From Theme B - Embedding Respect and Human Rights Due Diligence

Human rights due diligence is a fundamental expectation of the UNGPs and is dealt with in the five steps examined in indicators B.2.1-B.2.5. The steps of embedding policy commitments into company culture and broader management systems and reinforcing them with specific due diligence processes, ensures that a company takes a systematic and proactive, rather than ad hoc or reactive, approach to respecting human rights. Indicator B.1.1 looks at the responsibility and resources for **day-to-day** human rights functions, indicating how the due diligence process is resourced.

Expectations on Human Rights Due Diligence

Companies should identify and assess any negative impacts on human rights with which they may be involved. This includes actual impacts (past or current) and potential impacts (those possible in the future – also referred to as human rights risks). These may come from the company’s own activities and from its business relationships; both direct relationships and those one or more steps removed. The focus in human rights due diligence must be on risks to the human rights of people, as distinct from risks to the business itself, although the two are

increasingly related.

To address negative human rights impacts, businesses should integrate the findings from their impact assessments across relevant internal functions and processes, act to prevent and mitigate the impacts identified, and have the internal decision-making, budget allocation and oversight processes in place to enable effective responses.

Companies need to track their responses to actual and potential human rights impacts to evaluate how effectively they are being addressed. Tracking should be based on appropriate qualitative and quantitative indicators and draw on internal and external feedback, including from affected stakeholders. Additionally, the UNGPs expect companies to communicate externally to account for how they address human rights impacts.

The human rights due diligence process is analogous to a risk management framework for human rights; it is the cornerstone of the UNGPs and must be integrated into company operations with adequate resources and responsibilities.



From Theme B. Embedding respect and Human Rights Due Diligence

- B.1.1 Responsibility and resources** for day-to-day human rights functions
- B.2.1 Identifying:** Processes and triggers for identifying human rights risks and impacts
- B.2.2 Assessing:** Assessment of risks and impacts identified (salient risks and key industry risks)
- B.2.3 Integrating and Acting:** Integrating assessment findings internally and taking appropriate action
- B.2.4 Tracking:** Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts
- B.2.5 Reporting:** Accounting for how human rights impacts are addressed

B.1.1	Responsibility and resources for day-to-day human rights functions	
<i>Source: UNGP 19; UNGPRF A2 and A2.1; GRI 102-19 and 102-20</i>		
The Company outlines senior level responsibility for human rights within the Company as well as the organisation of the day-to-day responsibility for human rights across relevant internal functions.		
Score 1	Score 2	
The Company indicates the senior manager role(s) responsible for relevant human rights issues within the Company (i.e. responsibility for human rights is assigned to a senior manager(s)) and this includes responsibility for the ILO core labour standards at a minimum.	The Company also describes how day-to-day responsibility is allocated across the range of relevant functions of the Company. AND The Company describes how day-to-day responsibility for managing human rights issues within its supply chain is allocated.	
Points Available: 0, 0.5, 1, 1.5, 2*		
Guidance for Researchers:		
<ul style="list-style-type: none"> • <i>This indicator is focused on day-to-day responsibility, not on Board level responsibility</i> • <i>Relevant information can include:</i> <ul style="list-style-type: none"> ○ <i>Which staff position or business function has day-to-day responsibility for human rights within the company (e.g. corporate responsibility and sustainability, legal, ethics and compliance, external affairs, general managers, internal audit, and/or a specific position within the function);</i> ○ <i>Specific responsibilities of this staff position or business function for daily management of human rights;</i> ○ <i>The rationale for the company’s choice of how it organizes the responsibility for human rights;</i> ○ <i>Any evidence that the allocation of responsibility chosen by the company assists the company in making respect for human rights part of how it conducts business on a day-to-day basis.</i> • <i>The focus is on day-to-day responsibility and accountability from the operational level up through senior management.</i> • <i>‘Resources’ can mean either financial resources or human resources.</i> • <i>The "range of relevant functions" can be held by one person.</i> 		

B.2.1 Identifying: Processes and triggers for identifying human rights risks and impacts	
<i>Source: UNGP 17 and 18; UNGPRF B2 and C3; HRIB, 1.2.1; GRI 412-1 and 414-2</i>	
<p>The Company proactively identifies its human rights risks and impacts on an on-going basis, including when these are triggered by key moments of the Company’s activities (e.g. policy change, market entry, new projects, amongst others).</p> <p><i>Note: If a company describes that it has a clear global system for identifying human rights risks and impacts, then it is assumed that it operates that system in each particular location. As such, by complying with all criteria in score 2, a company is automatically assumed to have achieved a score 1.</i></p>	
Score 1	Score 2
The Company describes the process(es) to identify its human rights risks and impacts: in specific locations or activities, covering its own operations (i.e. impacts that it may cause or contribute to) AND Through relevant business relationships, including its supply chain.	The Company describes the global systems it has in place to identify its human rights risks and impacts on a regular basis across its activities, in consultation with affected or potentially affected stakeholders and internal or independent external human rights experts. This includes how the systems are triggered by new country operations, new business relationships or changes in the human rights context in particular locations. AND The Company’s description includes an explanation of when human rights impact assessments (HRIAs) or environmental and social impact assessments (ESIAs) covering human rights are/will be carried out.
Points Available: 0, 0.5, 1, 1.5, 2	
Guidance for Researchers: <ul style="list-style-type: none"> • <i>A list of material risks alone (as opposed to salient risks) is not sufficient for score 1 or 2..</i> 	

B.2.2 Assessing: Assessment of risks and impacts identified (salient risks and key industry risks)	
<i>Source: UNGP 17, 18 and 24; UNGPRF B1, B2 and C3; HRIB, 1.2.1.; GRI 412-1 and 414-2</i>	
Having identified its human rights risks and impacts, the Company assesses them and then prioritises its salient human rights risks and impacts.	
Score 1	Score 2
The Company describes its process(es) for assessing its human rights risks and impacts and what it considers to be its salient human rights issues including how relevant factors are taken into account, such as geographical, economic, social and other factors OR The Company publicly discloses the results of the assessments, which may be aggregated across its operations and locations.	The Company meets both of the requirements under Score 1.
Points Available: 0, 0.5, 1, 1.5, 2*	

B.2.3	Integrating and Acting: Integrating assessment findings internally and taking appropriate action	
<i>Source: UNGP 17, 19 and 24; UNGPRF C4; GRI 103-2</i>		
The Company integrates the findings of its assessments of human rights risks and impacts into relevant internal functions and processes by taking appropriate actions to prevent, mitigate or remediate its salient human rights issues.		
Score 1	The Company describes its global system to take action to prevent, mitigate or remediate its salient human rights issues, AND this includes a description of how its global system applies to its supply chain OR The Company provides an example of the specific conclusions reached and actions taken or to be taken on at least one of its salient human rights issues as a result of assessment processes in at least one of its activities/operations.	Score 2
		The Company meets both of the requirements under Score 1.
Points Available: 0, 0.5, 1, 1.5, 2		
Guidance for Researchers:		
<ul style="list-style-type: none"> • <i>“Global system” in the Score 1 requirement refers to systems across the Company; not just in particular locations (it is expected be at the same organisational level as the risk assessment process described in B.2.2, which it is meant to follow on from).</i> 		

B.2.4	Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts	
<i>Source: UNGP 17, 20 and 24; UNGPRF C5; GRI 103-3</i>		
The Company tracks and evaluates the effectiveness of actions taken in response to its human rights risks and impacts and describes how it uses that information to improve processes and systems on an ongoing basis.		
Score 1	The Company describes the system(s) for tracking the actions taken in response to human rights risks and impacts assessed and for evaluating whether the actions have been effective or have missed key issues or not produced the desired results. OR It provides an example of the lessons learned while tracking the effectiveness of its actions on at least one of its salient human rights issues as a result of the due diligence process.	Score 2
		The Company meets both of the requirements under Score 1.
Points Available: 0, 0.5, 1, 1.5, 2*		
Guidance for Researchers:		
<ul style="list-style-type: none"> • <i>Tracking is understood as reviewing the effectiveness of the actions determined and taken (as per B.2.3) to see how well they are addressing the salient risks identified (as per B.2.1 and B.2.2) and taking further actions (or adopting a different approach) if the results of the assessment require it. "Tracking" therefore goes beyond keeping up with the determined actions.</i> • <i>Health & Safety may qualify as an example for the ‘example’ aspect of the requirement.</i> • <i>We are looking for evidence that a global system is in place. Examples alone are not sufficient.</i> • <i>Information about how the company tracks its own progress is particularly important for demonstrating that it is consistently seeking to improve its human rights performance.</i> 		

B.2.5	Communicating: Accounting for how human rights impacts are addressed	
<i>Source: UNGP 20 and 21; UNGPRF C2</i>		
The Company communicates externally how it addresses its human rights impacts in a manner that is accessible to its intended audiences, especially affected stakeholders who have raised concerns, providing enough information to evaluate the adequacy of the response(s) and does not pose risks to affected stakeholders or personnel. This communication is distinct from engagement with potentially affected stakeholders for the purposes of assessing or addressing specific impacts (See also Indicators B.2.1 and B.2.2).		
Score 1	Score 2	
The Company describes or demonstrates how it communicates externally about its human rights impacts and how effective it has been in addressing those impacts (i.e. through the steps described in B.2.1 to B.2.4) AND The description includes communications covering human rights impacts involving the Company’s supply chain.	The Company also describes how it has responded to specific human rights concerns raised by, or on behalf of, affected stakeholders AND The Company also describes how it ensures that the affected or potentially affected stakeholders and their legitimate representatives are able to access these communications.	
Points Available: 0, 0.5, 1, 1.5, 2		
Guidance for Researchers:		
<ul style="list-style-type: none"> • <i>This indicator is about how companies ensure meaningful information on its human rights due diligence processes is available to external stakeholders, including affected stakeholders.</i> • <i>Under score 2 what is expected is evidence of concrete measures (i.e. not just public reporting) to ensure the information reaches the affected stakeholders, such as communicating via community billboards, worker notices or surveys etc</i> 		

From Theme C - Remedies and Grievance Mechanisms

These indicators focus on the extent to which a Company is able to/and provide(s) remedy in addressing actual adverse impacts on human rights. It covers a Company's approach to providing or cooperating in remediation when human rights harms – actual human rights impacts – have occurred. The indicators aim to assess the extent to which a Company has appropriate processes in place so that grievances may be addressed early and remediated directly where appropriate.

Expectations from the UN Guiding Principles on Business and Human Rights

- Where a company identifies that it has caused or contributed to negative human rights impacts, it should provide for or cooperate in their remediation through legitimate processes.
- Companies should establish or participate in effective operational-level grievance mechanisms for stakeholders who may be negatively impacted by their activities.
- Remediation processes provided by the state or third-party institutions can provide alternative channels for affected stakeholders to raise complaints or concerns. Complainants should be free to choose which available channels they wish to use.

Why is this important?

- Access to effective remedy is a human right in itself and therefore a core part of respecting human rights.
- Unless a company actively engages in the remediation of impacts it has caused or contributed to, it cannot fully meet its responsibility to respect human rights.
- Negative impacts may occur despite a company's best efforts, given the complexity of activities and business relationships involved. Companies need to be prepared for this situation they can respond quickly and effectively.
- Strong remediation processes can help prevent impacts or conflicts from increasing or escalating.

Theme C. Remedies and Grievance Mechanisms

C.1 *Grievance channels/mechanisms to receive complaints or concerns from workers*

C.2 *Grievance channels/mechanisms to receive complaints or concerns from external individuals and communities*

C.7 *Remediating adverse impacts and incorporating lessons learned*

C.1	Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers	
<i>Source: UNGP 22, 29 and 30; UNGPRF C6.1 and C6.3; GRI 103-2</i>		
<p>The Company has one or more channel(s)/mechanism(s) (its own, third party or shared) through which workers can raise complaints or concerns, including in relation to human rights issues. The channel(s)/mechanism(s) is available to all workers and takes into account accessibility by marginalised groups. The channel(s)/mechanism(s) is not used to undermine the role of legitimate trade unions (or equivalent worker bodies where the right to freedom of association and collective bargaining is restricted under law) in addressing labour-related disputes, nor to preclude access to judicial or other non-judicial grievance mechanisms.</p>		
Score 1	Score 2	
<p>The Company indicates that it has one or more channel(s)/mechanism(s), or participates in a shared mechanism, accessible to all workers to raise complaints or concerns related to the Company.</p> <p><i>Note: An explicit reference to human rights is not required, but a channel/mechanism that is specifically designed to cover other topics (e.g. a corruption hotline) will need to make clear to stakeholders that it can be used for human rights concerns as well.</i></p>	<p>The Company also discloses data about the practical operation of the channel(s)/mechanism(s), including the number of grievances about human rights issues filed, addressed or resolved. AND The company indicates that the channel(s)/mechanism(s) is available in all appropriate languages. AND The workers in its supply chain have access to either: the Company's own channel(s)/ mechanism(s) to raise complaints or concerns about human rights issues at the Company's suppliers or the Company expects its suppliers to establish a channel/mechanism for their workers to raise such complaints or concerns and to convey the same expectation on access to grievance channel(s) / mechanism(s) to their own suppliers.</p>	
Points Available: 0, 0.5, 1, 1.5, 2*		
<p>Guidance for Researchers:</p> <ul style="list-style-type: none"> Asking workers to speak to their managers does not qualify as a grievance mechanism. 		

C.2		Grievance channel(s)/mechanism(s) to receive complaints or concerns from external individuals and communities	
<i>Source: UNGP 22, 29 and 30; UNGPRF C6.1 and C6.3; GRI 103-2</i>			
The Company has one or more channel(s)/mechanism(s) (its own, third party or shared) through which individuals and communities of users who may be adversely impacted by the Company can raise complaints or concerns, including in relation to human rights issues.			
Score 1		Score 2	
The Company indicates that it has one or more channel(s)/mechanism(s), or participates in a shared mechanism, accessible to all external individuals and communities who may be adversely impacted by the Company (or individuals or organisations acting on their behalf or who are otherwise in a position to be aware of adverse impacts) to raise complaints or concerns, including about human rights issues related to the Company, particularly in high risk locations.		The Company also describes how it ensures the channel(s)/mechanism(s) is accessible to all potentially affected external stakeholders at all its own operations, including in local languages. AND The Company describes how it ensures external individuals and communities have access to the Company’s own channel(s)/ mechanism(s) to raise complaints or concerns about human rights issues at the Company’s suppliers or the Company expects its suppliers to establish a channel/mechanism for them to raise such complaints or concerns, and to convey the same expectation on access to grievance channel(s) / mechanism(s) to their suppliers.	
Points Available: 0, 0.5, 1, 1.5, 2*			

C.7		Remedying adverse impacts and incorporating lessons learned	
<i>Source: UNGP 19, 22 and 31; UNGPRF C6, C6.4 and C6.5; GRI 103-2 and 413-2</i>			
The Company provides for or cooperates in remediation to victims where it has identified that it has caused or contributed to adverse human rights impacts (or others have brought such information to the Company’s attention, such as through its grievance channel(s)/mechanism(s)). It also incorporates the lessons learned from remediation approaches into its channel(s)/mechanism(s) and processes to prevent future impacts.			
Score 1		Score 2	
For adverse human rights impacts which it has caused or to which it has contributed, the Company describes the approach it took to provide or enable a timely remedy for victims, OR if no adverse impacts have been identified then the Company describes the approach it would take to provide or enable timely remedy for victims.		For adverse human rights impacts which it has caused or to which it has contributed, the Company also describes changes to systems and procedures to prevent similar adverse impacts in the future OR if no adverse impacts have been identified then the Company describes the approach it would take to review and change systems and procedures to prevent similar adverse impacts in the future. AND The Company provides an evaluation of the effectiveness of the grievance channel(s)/mechanism(s).	
Points Available: 0, 0.5, 1, 1.5, 2*			

Scoring of the Indicators

The CHRB indicators follow a set structure, awarding either zero, half, one, one point five, or two points depending on whether the indicator requirements are assessed to have been met (following a review of publicly available information).

The 13 indicators selected from the full CHRB Methodology are scored on a simple unweighted basis as follows:

INDICATOR	TITLE	AVAILABLE POINTS					MAX SCORE
Theme A. Governance and Policy Commitments							
A.1.1	Commitment to respect human rights	0	*	1		2	8
A.1.2	Commitment to respect the human rights of workers	0	0.5	1	1.5	2	
A.1.4	Commitment to engage with stakeholders	0	*	1		2	
A.1.5	Commitment to remedy	0	*	1	1.5	2	
<i>Theme A weighting</i>						31%	
Theme B. Embedding respect and Human Rights Due Diligence							
B.1.1	Embedding - Responsibility and resources for day-to-day human rights functions	0	*	1	1.5	2	12
B.2.1	HRDD - Identifying: Processes and triggers for identifying human rights risks and impacts	0	0.5*	1	1.5	2	
B.2.2	HRDD - Assessing: Assessment of risks and impacts identified (salient risks and key industry risks)	0	*	1		2	
B.2.3	HRDD - Integrating and Acting: Integrating assessment findings internally and taking appropriate action	0	0.5*	1		2	
B.2.4	HRDD - Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts	0	*	1		2	
B.2.5	HRDD - Reporting: Accounting for how human rights impacts are addressed	0	0.5*	1	1.5	2	
<i>Theme B weighting</i>						46%	
C. Remedies and Grievance Mechanisms							
C.1	Grievance channels/mechanisms to receive complaints or concerns from workers	0	*	1	1.5	2	6
C.2	Grievance channels/mechanisms to receive complaints or concerns from external individuals and communities	0	*	1	1.5	2	
C.7	Remedying adverse impacts and incorporating lessons learned	0	*	1	1.5	2	
<i>Theme C weighting</i>						23%	
Max Available Score						26 points	

* Where a company has not met all the criteria for Score 1 but has met at least one or more of the requirements for Score 2, a half point may be awarded. This is to give credit to and distinguish companies that meet 'some' requirements as opposed to those that meet 'none'.

Note that in the full CHRB Methodology (including Themes D, E and F), Themes A, B and C normally represent 10%, 25% and 15% of the full marks. These weightings will be reviewed in 2020.