

Company name: American Eagle Outfitters

Total weighted score: 18.4* out of 100

Weighted score by measurement area

Weighted Score	Out of	Measurement area
2.5	20.0	Governance and strategy
2.2	17.5	Representation
0.0	17.5	Compensation and benefits
2.2	17.5	Health and well-being
6.6	17.5	Violence and harassment
2.5	5.0	Marketplace
2.5	5.0	Community

(*) The scores in this detailed assessment are unweighted (out of 2) and, therefore, change when weights are applied per the [Gender Benchmark Methodology 2020](#). Differences between the total weighted score and the sum of the weighted scores across measurement areas may occur due to rounding, but this has not had any overall effect on the ranking.

Governance and strategy (20% of total score)

CORPORATE

Indicator	Score (out of 2)	Assessment
1. Strategic action	0	NOT MET: There is no evidence that the company has made a public commitment to gender equality and women’s empowerment at CEO level.
		NOT MET: There is no evidence that the company has a gender strategy or has the company integrated gender equality and women’s empowerment into its business strategy
		NOT MET: There is no evidence that the company has undertaken a self- assessment or third-party assessment or certification for gender equality
		NOT MET: There is no evidence that the company publicly disclosed specific targets on gender equality and women’s empowerment
2. Senior leadership accountability	0	NOT MET: There is no evidence that the company has a specific individual or individuals with direct and overall responsibility for gender equality and women’s empowerment in the company
		NOT MET: There is no evidence that the company has targets on advancing gender equality and women’s empowerment in the full value chain or, therefore, annual oversight of progress against its targets.
3. Gender-responsive human rights due diligence process	0	NOT MET: The company has plans to assess supply chain risks, but has not done so yet, hence, there is no evidence that the company screens gender-related human rights impacts as part of its human rights due diligence process in its workplace and supply chain
		NOT MET: There is no evidence that the company assessed and prioritised gender-related human rights impacts as being salient.
		NOT MET: There is no evidence that the company has consulted any gender-specific stakeholder groups as part of its human rights due diligence risk identification and assessment process.

WORKPLACE

Indicator	Score (out of 2)	Draft assessment
4. Sex-disaggregated data	0	NOT MET: There is no evidence that the company collects, analyses and monitors sex-disaggregated grievance data (e.g. number of grievances reported, number of grievances remediated), at least annually.
		NOT MET: There is no evidence that the company collects, analyses and monitors sex-disaggregated data on the gender balance of its global workforce only at the manager levels of leadership at least annually.
		NOT MET: There is no evidence that the company collects, analyse and monitor sex-disaggregated data on the percentage of employees participating in its professional development, at least annually.
		NOT MET: There is no evidence that the company collects, analyses and monitors sex-disaggregated data on turnover and absenteeism at least annually.
		NOT MET: There is no evidence that the company collects analyses and monitors sex-disaggregated data on its global gender pay gap, at least annually.
		NOT MET: There is no evidence that the company collects, analyses and monitors sex-disaggregated data on the remediation of violence and harassment grievances at least annually.
		NOT MET: There is no evidence that the company collects, analyses and monitors sex-disaggregated data on the total procurement spend that is directed to women-owned businesses
		NOT MET: There is no evidence that the company collects, analyses and monitors sex-disaggregated data on injuries, fatalities and absenteeism of workers in the supply chain.
5. Grievance mechanism	2	<p>MET: The company's grievance mechanism includes at least 6 gender-responsive elements:</p> <ul style="list-style-type: none"> - Confidential - Anonymous - Alternate access to a party concerning the grievance, if the perpetrator is the direct supervisor of the aggrieved party - Allows verbal submission of grievances via a telephone line - Ensures protection of the aggrieved party (non-retaliation) - Is available in multiple language or has interpreters available.
6. Employee engagement	0	NOT MET: There is no evidence that the company's employee surveys specifically address gender equality & women's empowerment issues.
		NOT MET: There is no evidence that the company has integrated employee feedback regarding gender issues into its company policies and/or practices.
7. External stakeholder engagement	0	NOT MET: There is no evidence that the company engages with external stakeholders to inform its gender equality and women's empowerment efforts.
		NOT MET: There is no evidence that the company integrates external stakeholder feedback regarding gender issues into its company policies and/or practices.

SUPPLY CHAIN

Indicator	Score (out of 2)	Assessment
8. Commitment in the supply chain	0	NOT MET: The company conducts anonymous surveys with key factory partners to gather worker feedback on health and safety, engagement, communication, and satisfaction. However, it is not clear whether the questions on the survey include gender needs.
		NOT MET: There is no evidence that the company publicly disclosed specific targets on gender equality and women's empowerment in its supply chain
		NOT MET: There is no evidence that the company track its progress against the targets.

9. Grievance mechanism in the supply chain	0	NOT MET: There is no evidence that the company ensures its supply chain workers have access to its own grievance mechanism to raise complaints (including in relation to gender-related issues) about the company's suppliers or the company's operations
		NOT MET: There is no evidence that the company requires its suppliers to have a grievance mechanism in place for workers to raise complaints (including in relation to gender-related issues) related to the supplier or the company's operations.
10. Corrective action process in the supply chain	0.5	PARTIALLY MET: The company screens for 4 gender-related issues among its suppliers, as part of its audit process. - Sexual harassment - Discrimination against divorced or widowed women - Discrimination against pregnant or married women - Gender-based violence (other than sexual harassment) However, the company does not screen for other gender-related issues like intimidation, harassment, retaliation or violence against trade union members/representatives.
		NOT MET: The company describes that its factories are given ratings based on issues identified during audits that require management commitment and remediation efforts. However, there is no further explanation on which gender-related issues would require corrective action to be taken by a supplier within a set period of time in order to remediate the issue.
		NOT MET: The company identifies serious breaches of human trafficking and slavery as resulting in termination of the relationship with the supplier, but there is no evidence that the company has identified any gender-related issues as automatically resulting in termination of the relationship with a supplier.

Representation (17.5% of total score)

WORKPLACE

Indicator	Score (out of 2)	Assessment
11. Gender equality in leadership	0	NOT MET: The company has less than 40% women represented in their Board of Directors.
		NOT MET: 25% Less than 40% of the company's senior executives are women.
		NOT MET: There is no evidence regarding the gender balance at the company's senior management level
		NOT MET: There is no evidence regarding the gender balance at the company's middle/other management level
12. Professional development and promotion	0	NOT MET: There is no evidence that the company offers professional development programmes with specific support for women. Furthermore, there is no evidence that the company tracks the number of women participating in the professional development programmes offered.
		NOT MET: There is no evidence that the company collects sex-disaggregated data on percentage of employees promoted.
13. Occupational segregation	0	NOT MET: There is no evidence the company collects sex-disaggregated data on the gender balance of its workforce by occupational function.
14. Turnover and absenteeism	0	NOT MET: There is no evidence the company collects sex-disaggregated data on the annual turnover of employees.
		NOT MET: There is no evidence that company collects sex-disaggregated data on the annual absenteeism levels of employees

SUPPLY CHAIN

Indicator	Score (out of 2)	Assessment
15. Gender equality in leadership in the supply chain	0	NOT MET: There is no evidence that the company collects or requires its suppliers to collect sex-disaggregated data by leadership level across the supply chain.
		NOT MET: There is no evidence the company supports its suppliers in offering professional development opportunities to women workers in the supply chain.
16. Non-discrimination against pregnant and/or married women workers in the supply chain	1	MET: The company requires its suppliers to have an equal opportunity / non-discrimination policy that explicitly protects married/ pregnant women workers
		NOT MET: There is no evidence that the company requires its suppliers to provide training (e.g. unconscious bias training) to its hiring managers to ensure a non-biased approach to the recruitment and promotion of married / pregnant women workers
		NOT MET: There is no evidence that the company provides support to its suppliers to prevent discrimination against married or pregnant women workers.
17. Enabling environment for freedom of association and collective bargaining in the supply chain	1	MET: The company requires its suppliers to prohibit gender-specific intimidation, harassment, retaliation and violence against trade union members/representatives.
		NOT MET: The company refers to trainings provided by BetterWork but does not have evidence that the company provides, or require its suppliers to provide awareness and education (e.g. training) to workers on their rights to freedom of association and collective bargaining.
18. Gender-responsive procurement	0	NOT MET: There is no evidence that the company has made a public commitment to gender-responsive procurement.
		NOT MET: There is no evidence that the company procures from women-owned businesses.
		NOT MET: There is no evidence that the company has taken specific actions to increase its support for women-owned businesses.

Compensation and benefits (17.5% of total score)

WORKPLACE

Indicator	Score (out of 2)	Assessment
19. Gender pay gap	0	NOT MET: There is no evidence that the company collects sex-disaggregated pay gap data on its global operations.
		NOT MET: There is no evidence that the company collects sex-disaggregated pay data by different pay bands.
		NOT MET: There is no evidence that the company collects sex-disaggregated pay data by occupational function.
		NOT MET: There is no evidence that the company includes other financial benefits (e.g., insurance benefits, bonuses, retirement contributions) when analysing its gender pay gap.
		NOT MET: There is no evidence that the company uses a third party to undertake or verify its gender pay gap analysis.
		NOT MET: There is no evidence that the company has a strategy or is taking active steps to address any pay gaps identified.

20. Paid carer leave	0	NOT MET: There is no evidence that the company has a global policy of providing at least 14 weeks of paid primary carer leave to full-time employees.
		NOT MET: There is no evidence the company implements concrete actions (excluding policies) that promote the return to work and retention of workers after primary carer leave.
		NOT MET: There is no evidence that the company has a global policy of providing at least two weeks of paid secondary carer leave to full-time employees.
		NOT MET: There is no evidence the company has specific actions in place to encourage the uptake of secondary carer leave.
21. Childcare and other family support	0	NOT MET: There is no evidence that the company offers childcare or other family support to its employees.
22. Flexible work	0	NOT MET: There is no evidence the company offers flexible working hours to its employees or tracks its uptake.
		NOT MET: There is no evidence the company offers flexible work locations to its employees or tracks the uptake.

SUPPLY CHAIN

Indicator	Score (out of 2)	Assessment
23. Formal contracts in the supply chain	0	NOT MET: While the company's Code of Conduct states that suppliers must comply with local, national, and international laws and regulations, it does not explicitly state that suppliers must employ workers through formal, written contracts.
		NOT MET: There is no evidence that the company takes any specific actions to help ensure its suppliers support formal rather than informal work.
24. Living wage in the supply chain	0	NOT MET: The company's supplier code of conduct states that suppliers must pay at least the minimum wage or the prevailing local industry standard. However there is no evidence that it requires suppliers to pay their workers a living wage.
		NOT MET: There is no evidence that the company monitors the payment of living wages by its suppliers.
		NOT MET: There is no evidence the company takes specific actions to help ensure its suppliers pay their workers a living wage.
25. Family-friendly benefits provision in the supply chain	0	NOT MET: There is no evidence the company requires its suppliers to offer at least 14 weeks of paid primary carer leave to their workers.
		NOT MET: There is no evidence that the company requires its suppliers to offer at least two weeks of paid secondary carer leave to their workers.
		NOT MET: There is no evidence that the company requires its suppliers to provide childcare support to their workers.
		NOT MET: There is no evidence the company requires its suppliers to provide other family support to their workers.

Health and well-being (17.5% of total score)

WORKPLACE

Indicator	Score (out of 2)	Assessment
26. Health information and services for employees	0	NOT MET: There is no evidence regarding the costs covered for maternal health information and services, in countries where no or only partial government-funded support is provided.
		NOT MET: There is no evidence regarding the costs covered for sexual and reproductive health information and services, in countries where no or only partial government-funded support is provided.
		NOT MET: There is no evidence regarding the costs covered for mental health information and services, in countries where no or only partial government-funded support is provided.
		NOT MET: There is no evidence that the company provides coverage of the costs associated with maternal, sexual and reproductive, or mental health information and services for its employees in the US.

SUPPLY CHAIN

Indicator	Score (out of 2)	Assessment
27. Safe and health work environment in the supply chain	0	NOT MET: There is no evidence that the company requires its suppliers to address the specific health, safety and hygiene needs of their women workers.
		NOT MET: There is no evidence that the company monitors supplier adherence to these requirements on the specific health, safety and hygiene needs of their women workers.
		NOT MET: There is no evidence that the company supports its suppliers in ensuring a gender-responsive, safe and healthy work environment for their workers or requires suppliers to provide workers with health and safety training, to ensure the same.
28. Health information and services in the supply chain	1	MET: The company has made a commitment to gender-responsive health information/services in its supply chain.
		NOT MET: There is no evidence that the company requires its suppliers to have a clean health room/clinic on-site with credentialed health providers..
		PARTIALLY MET: The company support its suppliers in providing their workers with access to gender-responsive health information and services through its partnership with BSR's HER Project that focuses on nurse training and addressing sexual harassment. However, there is no evidence that it supports its suppliers in providing workers with access to other gender-responsive health information and services, such as those related to reproductive or maternal health.

Violence and harassment (17.5% of total score)

WORKPLACE

Indicator	Score (out of 2)	Assessment
29. Violence and harassment prevention	1.5	MET: The company covers violence and harassment and a zero-tolerance policy on violence, discrimination and harassment in its associate handbook.
		NOT MET: There is no evidence that the company provides training on violence and harassment to its employees.
		MET: The company takes additional actions to help prevent violence and harassment in the workplace by implementing internal communications that reinforce the company's zero tolerance of violence and harassment in the workplace by conducting annual Code of Ethics training to communicate its culture and values.
30. Violence and harassment remediation	1	PARTIALLY MET: The company has a remediation process for addressing violence and harassment grievances in the workplace that indicates clear disciplinary sanctions for the perpetrator. However, there is no evidence of protection/remedy for the victim, such as not requiring private arbitration or counselling/mental health support.

SUPPLY CHAIN

Indicator	Score (out of 2)	Assessment
31. Violence and harassment prevention in the supply chain	0.5	MET: The company's Code of Conduct states that workers must be free to raise complaints about workplace conditions without risk or retaliation in relation to harassment and abuse.
		NOT MET: There is no evidence that the company require that the violence and harassment policy be made available in one or more local language(s)
		NOT MET: There is no evidence that the company require its suppliers to provide training on violence & harassment to its managers and workers
		NOT MET: There is no evidence that the company provides support to its suppliers to prevent violence and harassment in the supply chain.
32. Violence and harassment remediation in the supply chain	0	NOT MET: There is no evidence that the company monitor its suppliers' remediation process for addressing violence & harassment grievances filed by their workers
		NOT MET: There is no evidence that the company requires its suppliers to have an effective remediation process for addressing violence & harassment grievances of their workers
		NOT MET: There is no evidence that the company requires its suppliers to collect sex-disaggregated data on the remediation of violence and harassment grievances.

Marketplace (5% of total score)

MARKETPLACE

Indicator	Score (out of 2)	Assessment
33. Marketing content	1	NOT MET: There is no evidence that the company has a public commitment which addresses how gender stereotypes are portrayed in its marketing campaigns.
		MET: Through the #AERIReal initiative, the company has ensured that its marketing approach for the brand seeks to challenge existing gender norms and promotes positive images of women and girls by choosing to not airbrush its models.

Community (5% of total score)

COMMUNITY

Indicator	Score (out of 2)	Assessment
34. Community support	1	MET: The company partners with BSR's HERproject to help train peer educators and participate in a Technical Advisory Group that's focused on developing a nurse training program, as well as a program focused on addressing sexual harassment in the factories, as well as surrounding communities. Its brand Aerie has also engaged with the NGO "Free the Girls" to start a bra give-back program to help sex trafficking survivors.
		MET: The HERproject is operating in Cambodia and Bangladesh, and the Free the Girls bra collection takes place in all stores.
		NOT MET: There is no evidence the company tracks the number of beneficiaries disaggregated by sex for its community programs.
		NOT MET: There is no evidence the company collects feedback from the beneficiaries or conducts impact assessments of its initiatives.

NB: "NOT MET" in the assessment above indicates WBA could not find information in public sources or the internal documents shared by the company to show that the company meets the requirements, as described in full in the Gender Benchmark Methodology Report 2020 and Scoring Guidelines 2021. This does not necessarily mean that the company is not taking any action under that indicator.