

<b>Company Name</b>	Associated British Foods
<b>Industry</b>	Agricultural Products (Supply Chain and Own Operations) & Apparel (Supply Chain only)
<b>Overall Score (*)</b>	24.2 out of 100

Theme Score	Out of	For Theme
1.2	10	A. Governance and Policies
10.1	25	B. Embedding Respect and Human Rights Due Diligence
0.8	15	C. Remedies and Grievance Mechanisms
5.3	20	D. Performance: Company Human Rights Practices
4.8	20	E. Performance: Responses to Serious Allegations
1.9	10	F. Transparency

(\*) Please note that any small differences between the Overall Score and the added total of Measurement Theme scores are due to rounding the numbers at different stages of the score calculation process.

Please note also that the "Not met" labels in the Explanation boxes below do not necessarily mean that the company does not meet the requirements as they are described in the bullet point short text. Rather, it means that the analysts could not find information *in public sources* that met the requirements *as described in full* in the CHRB 2019 Methodology document. For example, a "Not met" under "General HRs Commitment", which is the first bullet point for indicator A.1.1, does not necessarily mean that the company does not have a general commitment to human rights. Rather, it means that the CHRB could not identify a public statement of policy in which the company commits to respecting human rights.

## Detailed assessment

### A. Governance and Policies (10% of Total)

#### A.1 Policy Commitments (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1.1	Commitment to respect human rights	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>Met: General HRs commitment: The Company states in the Annual report that 'being part of Associated British Foods means being part of a community that respects human rights and celebrates diversity. We recognise the United Nations Guiding Principles on Business and aim to adhere to the core ILO conventions and all relevant laws relating to working conditions and employment'. It also indicates that 'while respecting all human rights throughout the business, six priority areas of focus to mitigate risk have been highlighted, namely: workplace safety; gender and diversity; slavery and human trafficking; supply chain; use of commodities; access to water'. [Primark Supplier code of conduct, 02/2017: <a href="http://primark.a.bigcontent.io">primark.a.bigcontent.io</a> &amp; Supplier code of conduct: <a href="http://abf.co.uk">abf.co.uk</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>Not met: UNGPs: The company has indicated that it 'recognises the United Nations Guiding Principles on Business and Human Rights (UNGPs)' though it has not indicated it commits to respect the principles it outlines. [Annual Report and Accounts 2018, Sept 2018: <a href="http://abf.co.uk">abf.co.uk</a>]</li> <li>Not met: OECD</li> </ul>
A.1.2	Commitment to respect the human rights of workers	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>Not met: ILO Core: The company indicates that 'our comprehensive groupwide Supplier Code of Conduct sets out the values and standards we expect of our suppliers, representatives and the other people with whom we deal. It is based on the eight core conventions (which cover collective bargaining, forced labour, child</li> </ul>

			<p>labour and discrimination) of the International Labour Organization (ILO) and the Ethical Trade Initiative (ETI) Base Code'. However, on the one hand, 'based on' is not considered a formal commitment to respecting human rights following CHRB criteria. On the other hand, no formal commitment to respecting the ILO Core Conventions for its own operations found. [Annual Report and Accounts 2018, Sept 2018: <a href="http://abf.co.uk">abf.co.uk</a>]</p> <ul style="list-style-type: none"> <li>• Not met: UNGC principles 3-6</li> <li>• Met: Explicitly list All four ILO for AG suppliers: The Company commits to each ILO core in its Supplier Code of Conduct, including discrimination, forced labour, child labour, freedom of association and collective bargaining. In relation to freedom of association and collective bargaining, the Company states that 'Workers, without distinction, have the right to join or form trade unions of their own choosing and to bargain collectively'. [Supplier code of conduct: <a href="http://abf.co.uk">abf.co.uk</a>]</li> <li>• Met: Explicitly list ALL four ILO for AP suppliers: The Primark code of conduct for suppliers contains a commitment to each of discrimination, forced labour, child labour, freedom of association and collective bargaining. In relation to these last two, it indicates that 'workers, without distinction, have the right to join or form trade unions of their own choosing and to bargain collectively. [...] Where the right to freedom of association and collective bargaining is restricted under law, the employer facilitates, and does not hinder, the development of parallel means for independent and free association and bargaining'. [Primark Supplier code of conduct, 02/2017: <a href="http://primark.a.bigcontent.io">primark.a.bigcontent.io</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Explicit commitment to All four ILO Core: In a public submission to the CHRB The Company indicates the following: 'We respect the following internationally recognised labour rights: 1. Employment is freely chosen (meaning it is not forced or resulting from debt bondage) 2. Freedom of association and the right to collective bargaining are respected 3. Working conditions are safe and hygienic. 4. Child labour shall not be used. 5. Living wages are paid. 6. working hours are not excessive. 6. No discrimination is practised'. However, this is not part of a formal policy or public document approved by the board. Moreover, the Supplier Code indicates that regarding to child labour "Policies and procedures shall conform to the provisions of the relevant International Labour Organization (ILO) standards". However, it only applies to its supplier, not for its own operations. [Supplier code of conduct: <a href="http://abf.co.uk">abf.co.uk</a> &amp; Additional disclosures to CHRB, 11/2016]</li> <li>• Met: Respect H&amp;S of workers: The Company has a specific health and safety policy including commitment to 'providing a safe and healthy workplace to protect all employees, contractors, visitors and the public from foreseeable work hazards'. The policy contains a list of specific safety-related commitments. [Health and safety policy: <a href="http://abf.co.uk">abf.co.uk</a>]</li> <li>• Met: H&amp;S applies to AG suppliers: The supplier code contains requirements regarding health and safety [Supplier code of conduct: <a href="http://abf.co.uk">abf.co.uk</a>]</li> <li>• Met: H&amp;S applies to AP suppliers: The Primark supplier code contains requirements regarding health and safety [Primark Supplier code of conduct, 02/2017: <a href="http://primark.a.bigcontent.io">primark.a.bigcontent.io</a>]</li> <li>• Not met: working hours for workers: The Supplier Code indicates that "working hours comply with national laws and benchmark industry standards, whichever affords greater protection". No evidence found of a clear commitment to respecting the working hours for its own workers. [Supplier code of conduct: <a href="http://abf.co.uk">abf.co.uk</a> &amp; Primark Supplier code of conduct, 02/2017: <a href="http://primark.a.bigcontent.io">primark.a.bigcontent.io</a>]</li> <li>• Met: Working hours for AP suppliers: The Primark supplier code contains requirements regarding working hours: 'Standard working hours, excluding overtime, shall be defined by contract and shall not exceed 48 hours per week. [...] The total hours worked, including overtime, in any 7 day period shall not exceed 60 hours, except where covered by clause 7.5 below. 7.5 The Total working hours may, including overtime, exceed 60 hours in any 7 day period only in exceptional circumstances where ALL of the following are met: • This is allowed by national law; • This is allowed by a collective agreement freely negotiated with a workers' organisation representing a significant portion of the workforce; • Appropriate safeguards are taken to protect the workers' health and safety; and • The employer can demonstrate that exceptional circumstances apply such as unexpected production peaks, accidents or emergencies. 7.6 Workers shall be provided with at least 1 day off in every 7 day period or, where allowed by national law, 2 days off in every 14 day period.' [Primark Supplier code of conduct, 02/2017: <a href="http://primark.a.bigcontent.io">primark.a.bigcontent.io</a>]</li> </ul>
A.1.3.AG.a	Commitment to respect human rights particularly	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Respect land ownership and natural resources: One of the Company's subsidiaries, Illovo, has a land policy which includes a commitment to obtain FPIC</li> </ul>

	relevant to the industry - land and natural resources (AG)		<p>and zero tolerance to land grabs. ABF also has a supplier policy in which it commits to 'adhering to the principle of free, prior and informed consent of all communities when acquiring land'. Moreover, the company indicates, in its CR Update 2018, that 'we also distribute water to people living on or near our African sugar cane estates because we believe that everyone has the right to clean, safe water for drinking and sanitation'. However, we look for a company wide policy commitment on land ownership and natural resources [Supplier code of conduct: <a href="http://abf.co.uk">abf.co.uk</a> &amp; Illovo guidelines on land and land Rights: <a href="http://ilovosugarafica.com">ilovosugarafica.com</a>]</p> <ul style="list-style-type: none"> <li>• Not met: Respecting the right to water: The company indicates that 'we also distribute water to people living on or near our African sugar cane estates because we believe that everyone has the right to clean, safe water for drinking and sanitation'. However, no evidence found of a formal commitment to respect right to water in agricultural operations. [CR Update 2018, 06/11/2018: <a href="http://abf.co.uk">abf.co.uk</a>]</li> <li>• Met: Expecting suppliers to respect these rights: The supplier code contains the following commitment in relation to land: 'we adhere to the principle of free, prior and informed consent of all communities when acquiring land. The rights of communities and traditional peoples to maintain access to land and natural resources will be recognised and respected'. [Supplier code of conduct: <a href="http://abf.co.uk">abf.co.uk</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: FPIC for all: See above. [Illovo guidelines on land and land Rights: <a href="http://ilovosugarafica.com">ilovosugarafica.com</a>]</li> <li>• Met: Zero tolerance for land grabs: See above [Illovo guidelines on land and land Rights: <a href="http://ilovosugarafica.com">ilovosugarafica.com</a>]</li> <li>• Not met: Respecting the right to water: As indicated above, although the Company carries out actions in relation to water, no evidence found of formal commitment.</li> <li>• Not met: Expecting suppliers to respect these rights: The Supplier code of conduct contains the following commitment: 'we adhere to the principle of free, prior and informed consent of all communities when acquiring land. The rights of communities and traditional peoples to maintain access to land and natural resources will be recognised and respected'. However, no evidence found in relation to the right to water. [Supplier code of conduct: <a href="http://abf.co.uk">abf.co.uk</a>]</li> </ul>
A.1.3.AG.b	Commitment to respect human rights particularly relevant to the industry – people's rights (AG)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Women's rights</li> <li>• Not met: Children's rights: In its supplier code, it is stated that "child labour shall not be used". However, no evidence found of a commitment to respecting children's rights (within its own operations). [Supplier code of conduct: <a href="http://abf.co.uk">abf.co.uk</a>]</li> <li>• Not met: Migrant worker's rights</li> <li>• Not met: Expects suppliers to respect these rights: In its supplier code, it is stated that "child labour shall not be used". However, CHRB requires companies to expect a commitment from its suppliers to respecting children's rights. No evidence found in relation to women's rights and the rights of migrant workers either. [Supplier code of conduct: <a href="http://abf.co.uk">abf.co.uk</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: CEDAW/Women's Empowerment Principles</li> <li>• Not met: Child Rights Convention/Business Principles</li> <li>• Not met: Convention on migrant workers</li> <li>• Not met: Expecting suppliers to respect these rights</li> </ul>
A.1.3.AP	Commitment to respect human rights particularly relevant to the industry (AP)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Women's Rights</li> <li>• Not met: Children's Rights</li> <li>• Not met: Migrant worker's rights: The company indicates that 'recruitment practices can present a particular risk to migrant and agency workers. We are reviewing our approach to recruitment practices within the supply chain to identify opportunities to strengthen this'. It reports on actions carried out in this sense, including the development of policies. However, no evidence found of an existing formal commitment to respecting the rights of its migrant workers as well as to expect the same from its suppliers. [Primark MSA 2018, 05/03/19: <a href="http://modernslaveryregistry.org">modernslaveryregistry.org</a>]</li> </ul> <ul style="list-style-type: none"> <li>• Not met: Expecting suppliers to respect these rights: Although the supplier code refers to child labour, no specific evidence found of commitment to respect children's rights. No evidence found in relation to women's and migrants' rights either. [Primark Supplier code of conduct, 02/2017: <a href="http://primark.a.bigcontent.io">primark.a.bigcontent.io</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: CEDAW/Women's Empowerment Principles</li> <li>• Not met: Child Rights Convention/Business principles</li> <li>• Not met: Convention on migrant workers</li> </ul>

			<ul style="list-style-type: none"> <li>• Not met: Respecting the right to water</li> <li>• Not met: Expecting suppliers to respect these rights</li> </ul>
A.1.4	Commitment to engage with stakeholders	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Regular stakeholder engagement: The Company only reports on its subsidiary, Illovo, strategies to engage with affected stakeholders on land issues around its operations but it does not have a public policy on engaging with affected stakeholders. In the 2018 report the company indicates that it 'engage(s) with a wide range of NGOs on social matters, primarily at the level of our individual businesses due to the often local and subject-specific nature of these engagements'. On its AB Sugar website, the Company describes how it engaged with communities of growers in the surroundings of its operations in Mozambique to help them improve their knowledge about land rights and how to increase their capacities in relation to this issue. [AB Sugar Land Project, 10/07/19: <a href="http://absugar.com">absugar.com</a> &amp; Corporate Responsibility Report 2018, 06/11/2018: <a href="http://abf.co.uk">abf.co.uk</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Commits to engage stakeholders in design</li> <li>• Not met: Regular stakeholder design engagement: Primark indicates that 'external stakeholders are a vital source of information and guidance to help us understand the risk of modern slavery in our supply chains, how to identify it, and which groups may be most vulnerable. Their insight and knowledge is invaluable and feeds into our context assessment. External stakeholders also assist in the development of strategies and approaches to prevent or remediate issues'. It also indicates that the supplier code of conduct was modified following stakeholder consultation. However, no details found beyond Primark. Although the Company also reports in relation to a public private partnership that Jordans Dorset Ryvita joined to eradicate child labour, no details found on engagement with affected stakeholders on this issue. [CR Update 2018, 06/11/2018: <a href="http://abf.co.uk">abf.co.uk</a> &amp; Primark MSA 2018, 05/03/19: <a href="http://modernslaveryregistry.org">modernslaveryregistry.org</a>]</li> </ul>
A.1.5	Commitment to remedy	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Commits to remedy</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Not obstructing access to other remedies</li> <li>• Not met: Collaborating with other remedy initiatives</li> <li>• Not met: Work with AG suppliers to remedy impacts: The company indicates that "it is currently working to develop specific grievance mechanisms to provide workers in the supply chain access to remedy". However, no evidence found on whether the Company is committed to work with Primark's business relationships to remedy adverse impacts linked to its operations, (either through the business relationships' mechanisms or working with them in the development of third party non-judicial remedies). [CR Update 2018, 06/11/2018: <a href="http://abf.co.uk">abf.co.uk</a>]</li> <li>• Not met: Work with AP suppliers to remedy impacts</li> </ul>
A.1.6	Commitment to respect the rights of human rights defenders	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Zero tolerance attacks on HRs Defenders (HRDs): In the public submission to the CHRB, the Company states that 'Associated British Foods does not tolerate threats, intimidation, physical or legal attacks against human rights defenders, including those exercising their rights to freedom of expression, association, peaceful assembly and protest against the business or its operations'. However, this statement needs to be in a formal public document and/or approved by the board in order to be considered as fit. [Additional disclosures to CHRB, 11/2016 &amp; Corporate Responsibility Report 2018, 06/11/2018: <a href="http://abf.co.uk">abf.co.uk</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Expects AG suppliers to reflect company HRD commitments</li> <li>• Not met: Expects AP suppliers to reflect company HRD commitments</li> </ul>

## A.2 Policy Commitments (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.2.1	Commitment from the top	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Not met: CEO or Board approves policy: The Company released a policy on Modern Slavery, signed by the Company Secretary. Although the Company indicates that the modern slavery statement has been approved by the board, it does not contain the Company's formal human rights commitments. In addition, Primark Modern slavery Statement is signed by this company's CEO, but no evidence of global CEO/Board approving the policy. The same applies for the AB Agri Human Rights policy. [Modern Slavery and Human Trafficking Statement 2018, 31/10/2018: <a href="http://abf.co.uk">abf.co.uk</a> &amp; Primark MSA 2018, 05/03/19: <a href="http://modernslaveryregistry.org">modernslaveryregistry.org</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Not met: Board level responsibility for HRs</li> <li>Not met: Speeches/letters by Board members or CEO</li> </ul>
A.2.2	Board discussions	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Not met: Board/Committee review of salient HRs: On its website, the Company indicates that 'the chief executive of each business is required to submit an annual risk survey identifying all relevant risks for the business, including safety, environment and other CR issues' and 'finance directors also annually provide a report on progress against each business' identified CR priorities'. CR priorities explicitly include health and safety and human rights in the context of suppliers. However, this seem to be a subcompany level, whereas we look for group level discussion in Board meetings. [Our approach to CR: <a href="http://abf.co.uk">abf.co.uk</a> &amp; Our approach to CR - Priorities: <a href="http://abf.co.uk">abf.co.uk</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Not met: Examples or trends re HR discussion</li> <li>Not met: Both examples and process</li> </ul>
A.2.3	Incentives and performance management	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Not met: Incentives for at least one board member</li> <li>Not met: At least one key AG HR risk, beyond employee H&amp;S</li> <li>Not met: At least one key AP HR risk, beyond employee H&amp;S</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Not met: Performance criteria made public</li> </ul>

## B. Embedding Respect and Human Rights Due Diligence (25% of Total)

### B.1 Embedding Respect for Human Rights in Company Culture and Management Systems (10% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.1	Responsibility and resources for day-to-day human rights functions	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Not met: Commits to ILO core conventions</li> <li>Met: Senior responsibility for HR: On its website, approach to CR section, it is indicated that '(CR) lead and a Health, Safety and Environment (HSE) lead. The CR and HSE leads from the business meet regularly and are supported by the central CR and HSE teams within Associated British Foods. The 'Director of Legal Services and Company Secretary' is the Group Responsible for CR. [Our approach to CR: <a href="http://abf.co.uk">abf.co.uk</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Not met: Day-to-day responsibility</li> <li>Not met: Day-to-day responsibility for AG in supply chain</li> <li>Not met: Day-to-day responsibility for AP in supply chain</li> </ul>
B.1.2	Incentives and performance management	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Not met: Senior manager incentives for human rights</li> <li>Not met: At least one key AG HR risk, beyond employee H&amp;S</li> <li>Not met: At least one key AP HR risk, beyond employee H&amp;S</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Not met: Performance criteria made public</li> </ul>
B.1.3	Integration with enterprise risk management	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Met: HR risks is integrated as part of enterprise risk system: Health and safety and supply chain's ethical business practices, including poor working conditions of workers are issues included in the Company's risk management system. In addition,</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>the Company's statement on modern slavery includes risk assessment of modern slavery (which includes among others issues of forced labour, child labour, domestic servitude or human trafficking) in the supply chain and the Company's own hiring practices. [Modern Slavery and Human Trafficking Statement 2018, 31/10/2018: <a href="http://abf.co.uk">abf.co.uk</a> &amp; Corporative Responsibility Report 2018, 06/11/2018: <a href="http://abf.co.uk">abf.co.uk</a>]</p> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Audit Ctte or independent risk assessment</li> </ul>
B.1.4.a	Communication /dissemination of policy commitment(s) within Company's own operations	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Commits to ILO core conventions: Please see indicator A.1.2</li> <li>• Not met: Communicates its policy to all workers in own operations: The Company provides evidence of having a video for its sugar business covering some human rights issues (child, forced and bonded labour). However, it is not clear that policies are communicated to all employees, including local languages where necessary. In addition, the Company reports about Primark's code of conduct and how it is translated and also indicates that 'our local Primark Ethical Trade teams on the ground in key sourcing regions provide over 7,000 hours of support and training annually to help suppliers understand the Code and how to implement it', no evidence found of communication of Company's policies to all company's employees. [CR Update 2018, 06/11/2018: <a href="http://abf.co.uk">abf.co.uk</a> &amp; Modern Slavery Video, 10/07/19: <a href="http://absugar.com">absugar.com</a>] <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Commits to all 4 ILO core conventions</li> <li>• Not met: Communication of policy commitments to stakeholder</li> <li>• Not met: How policy commitments are made accessible to audience</li> </ul> </li></ul>
B.1.4.b	Communication /dissemination of policy commitment(s) to business relationships	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Commits to all 4 ILO core conventions for suppliers: See indicator A.1.2</li> <li>• Met: Requiring AG suppliers to communicate policy down the chain: In a public submission to CHRB the Company states that 'Whenever any Associated British Foods business enters into a relationship with a supplier, the Supplier Code of Conduct is always included in our contractual terms. In some instances, our relationship with a supplier pre-date the creation of Supplier Code of Conduct, meaning they may not have a formal contract in place but they are certainly expected to abide by it'. The Code of conduct for suppliers states that 'suppliers and representatives should comply with and seek to develop relationships with their own supply chains consistent with the principles set out below and should be compliant with all local laws and the following principles as a minimum'. [Supplier code of conduct: <a href="http://abf.co.uk">abf.co.uk</a> &amp; Additional disclosures to CHRB, 11/2016]</li> <li>• Met: Communicating policy down the whole AP supply chain: In a public submission to CHRB the Company states that 'Whenever any Associated British Foods business enters into a relationship with a supplier, the Supplier Code of Conduct is always included in our contractual terms. In some instances, our relationship with a supplier pre-date the creation of Supplier Code of Conduct, meaning they may not have a formal contract in place but they are certainly expected to abide by it'. [Supplier code of conduct: <a href="http://abf.co.uk">abf.co.uk</a> &amp; Additional disclosures to CHRB, 11/2016]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: How HR commitments made binding/contractual: As indicated in the submission to CHRB: the Supplier Code of Conduct is always included in our contractual terms. In some instances, our relationship with a supplier pre-date the creation of Supplier Code of Conduct, meaning they may not have a formal contract in place but they are certainly expected to abide by it'. [Additional disclosures to CHRB, 11/2016]</li> <li>• Not met: Including on AG suppliers: The Supplier Code of Conduct indicates that "suppliers and representatives should comply with and seek to develop relationships with their own supply chains consistent with the principles set out (...) and should be compliant with all local laws and the following principles as a minimum". However, no evidence that the company requires the supplier to cascade the contractual or other binding requirements down their supply chain. [Supplier code of conduct: <a href="http://abf.co.uk">abf.co.uk</a>]</li> <li>• Not met: Including on AP suppliers: The Supplier Code of Conduct indicates that "suppliers and representatives should comply with and seek to develop relationships with their own supply chains consistent with the principles set out (...) and should be compliant with all local laws and the following principles as a minimum". However, no evidence that the company requires the supplier to</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			cascade the contractual or other binding requirements down their supply chain. [Supplier code of conduct: <a href="http://abf.co.uk">abf.co.uk</a> ]
B.1.5	Training on Human Rights	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Scores at least 1 on A.1.2</li> <li>• Not met: Trains all workers on HR policy commitments: No evidence that all ABF workers are trained on HR policy commitments was found. There is evidence on Primark's website of training both its own workers and suppliers, and it indicates that 'In 2017, Primark launched a training course for its suppliers on forced labour and modern slavery'. No further information found in the CR Report 2018. [Modern Slavery and Human Trafficking Statement 2018, 31/10/2018: <a href="http://abf.co.uk">abf.co.uk</a> &amp; CR Update 2018, 06/11/2018: <a href="http://abf.co.uk">abf.co.uk</a>]</li> <li>• Met: Trains relevant AG managers including procurement: The modern slavery statement indicates that 'last year we conducted a group wide awareness-raising training session, which was delivered to senior CR and procurement leads. We made the businesses aware of the scale, scope and pervasive risks of modern slavery and positioned the issue in the broader context of business and human rights, including an overview of the United Nations Guiding Principles on Business and Human Rights. It also enabled the sharing of best practice within the group and raised awareness of the broader human rights agenda for business'. In addition, the CR Report 2018 indicates that 'In June 2018, nearly 130 Associated British Foods procurement representatives from across EMEA came together and discussed key human rights issues and supporting legislation'. It also discloses details of the workshop. [Modern Slavery and Human Trafficking Statement 2018, 31/10/2018: <a href="http://abf.co.uk">abf.co.uk</a> &amp; CR Update 2018, 06/11/2018: <a href="http://abf.co.uk">abf.co.uk</a>]</li> <li>• Met: Trains relevant AP managers including procurement: As indicated above, training for CR and procurement was conducted "group wide". [Modern Slavery and Human Trafficking Statement 2018, 31/10/2018: <a href="http://abf.co.uk">abf.co.uk</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Score of 2 on A.1.2</li> <li>• Not met: Both requirements under score 1 met</li> </ul>
B.1.6	Monitoring and corrective actions	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Scores at least 1 on A.1.2</li> <li>• Not met: Monitoring implementation of HR policy commitments: The Company discloses details of how it monitors suppliers through audits and partnerships, and the code for suppliers include all ILO core. However, it has not indicated how it monitors its own operations. [CR Update 2018, 06/11/2018: <a href="http://abf.co.uk">abf.co.uk</a> &amp; Supplier code of conduct: <a href="http://abf.co.uk">abf.co.uk</a>]</li> <li>• Met: Monitoring AG suppliers: The Company states that 'we audit high-priority suppliers either using approved external auditors or our own internal team. We audit against our supplier code of Conduct, which provides insight to the working conditions and labour standards of the factories that supply our products. In addition, we collaborate with other buyers using Sedex and AIM Progress to share audits and reduce audit fatigue for suppliers'. [Modern Slavery and Human Trafficking Statement 2018, 31/10/2018: <a href="http://abf.co.uk">abf.co.uk</a>]</li> <li>• Met: Monitoring AP suppliers: See above [Modern Slavery and Human Trafficking Statement 2018, 31/10/2018: <a href="http://abf.co.uk">abf.co.uk</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Score of 2 on A.1.2</li> <li>• Not met: Describes corrective action process</li> <li>• Not met: Example of corrective action</li> <li>• Not met: Discloses % of AG supply chain monitored</li> <li>• Not met: Discloses % of AP supply chain monitored</li> </ul>
B.1.7	Engaging business relationships	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: HR affects AG selection of suppliers: Although AB Mauri shows evidence of taking into account human rights performance in the identification and selection of potential business relationships, it is not clear that it takes place with all agricultural subsidiaries of the company. [CR Update 2018, 06/11/2018: <a href="http://abf.co.uk">abf.co.uk</a>]</li> <li>• Met: HR affects on-going AG supplier relationships: In its suppliers' code of conduct the Company has indicated that 'in the event that we become aware of any actions or conditions not in compliance with the Code, we reserve the right to request corrective actions. ABF reserves the right to terminate an agreement with any supplier and representatives that does not comply with the Code'. [Supplier code of conduct: <a href="http://abf.co.uk">abf.co.uk</a>]</li> <li>• Met: HR affects AP selection of suppliers: The company indicates that 'before Primark places its first order, a member of the Ethical Trade and Environmental</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Sustainability Team meets with the factory to explain the standards required and to carry out a formal audit of current factory conditions. Audits help us to assess a factory's performance against the Code of Conduct. In the case of new suppliers and their factories, an audit allows us to be confident that the conditions in the factory are acceptable before we approve a factory for use. [Conducting checks and audits Primark UK, 09/07/19: <a href="http://primark.com">primark.com</a>]</p> <ul style="list-style-type: none"> <li>Met: HR affects on-going AP supplier relationships: Primark's supplier code states that 'where suppliers breach this Code of Conduct we will try to work with them to improve business standards and employee welfare. However, we reserve the right to terminate our arrangement with that supplier immediately for appropriate transgressions or where there is no willingness to make the necessary changes'. [Primark Supplier code of conduct, 02/2017: <a href="http://primark.a.bigcontent.io">primark.a.bigcontent.io</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>Not met: Both requirement under score 1 met</li> <li>Not met: Working with AG suppliers to improve performance: It explains how it works with suppliers stating: 'If there are any cases where our suppliers are found not to be meeting the expectations and standards laid out in our Supplier Code of Conduct, we work with them, offering training and support, to help them improve. We only terminate commercial relationships with suppliers if no improvements are made over an agreed timeframe or there is no commitment to make them (...). In a number of cases, we have ensured that suppliers get further in-depth training and capacity building'. However, no evidence found of general work carried out to improve (AG) suppliers performance in human rights. [CR Update 2018, 06/11/2018: <a href="http://abf.co.uk">abf.co.uk</a>]</li> <li>Met: Working with AP suppliers to improve performance: The company indicates that Primark Ethical Trade teams (its apparel subsidiary) 'on the ground in key sourcing regions provide over 7,000 hours of support and training annually to help suppliers understand the Code and how to implement it'. Moreover, 'Primark partnered with Verité to design a 'Fair Hiring Fair Labour' toolkit to identify human rights and compliance-related risks around hiring and recruitment practices. This toolkit has been used in factories and mills in our South Indian supply chain to assess the management practices of factories with particular reference to recruitment and hiring, screening and managing brokers, and on-site management of workers'. [Primark MSA 2018, 05/03/19: <a href="http://modernslaveryregistry.org">modernslaveryregistry.org</a> &amp; CR Update 2018, 06/11/2018: <a href="http://abf.co.uk">abf.co.uk</a>]</li> </ul>
B.1.8	Approach to engagement with potentially affected stakeholders	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>Not met: Stakeholder process or systems: In a public submission to CHRB the Company states that: 'We nurture ethical business practices through the actions we undertake every day and, if we observe something is not right, we act quickly to correct it. We engage with a wide range of NGOs and campaigning organisations and, when our attention is drawn to an affected stakeholder group, we always seek to engage them directly to understand and remedy their concerns. We also undertake multi-stakeholder engagement. For instance, we choose to work with local NGOs and government organisations as well as organisations like the ETI to manage complex supply chain challenges'. However, although Illovo does commit to engaging with all affected stakeholders when it acquires new land, no evidence found on the systems in place to systematically identify affected stakeholders, or frequency and triggers for engagement on human rights issues by type or stakeholders group. In Primark Modern Slavery Statement, it is stated that "External stakeholders are a vital source of information and guidance to help us understand the risk of modern slavery in our supply chains, how to identify it, and which groups may be most vulnerable. Their insight and knowledge is invaluable and feeds into our context assessment. External stakeholders also assist in the development of strategies and approaches to prevent or remediate issues. Among others, they include civil society groups, trade unions, governments, international agencies, multi-stakeholder initiatives, and legal experts". CHRB is looking for evidence of engagement cross-operation, not exclusively within Primark businesses. Moreover, we want to know how stakeholders are identified and how the dialogue with affected and potentially affected stakeholders take place. [Additional disclosures to CHRB, 11/2016 &amp; Primark MSA 2018, 05/03/19: <a href="http://modernslaveryregistry.org">modernslaveryregistry.org</a>]</li> <li>Not met: Frequency and triggers for engagement: Although the Company reports stakeholder engagement, no details found in relation to descriptions of frequency and triggers to engage with affected stakeholders [Primark MSA 2018, 05/03/19: <a href="http://modernslaveryregistry.org">modernslaveryregistry.org</a> &amp; CR Update 2018, 06/11/2018: <a href="http://abf.co.uk">abf.co.uk</a>]</li> <li>Not met: Workers in AG SC engaged [Primark MSA 2018, 05/03/19: <a href="http://modernslaveryregistry.org">modernslaveryregistry.org</a>]</li> </ul>



Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Not met: Communities in the AG SC engaged: Although the Company reports on stakeholder engagement, no evidence found of the system required above being applied somehow to workers in the supply chain. [Primark MSA 2018, 05/03/19: <a href="http://modernslaveryregistry.org">modernslaveryregistry.org</a>]</li> <li>• Not met: Workers in AP SC engaged</li> <li>• Not met: Communities in the AP SC engaged</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Analysis of stakeholder views and company's actions on them</li> </ul>

## B.2 Human Rights Due Diligence (15% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.1	Identifying: Processes and triggers for identifying human rights risks and impacts	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Identifying risks in own operations: The Company indicates that “Twinings [a hot beverage brand that belongs to the group] worked with a global sustainability organization to undertake a human rights assessment of its whole operations and supply chain. The Social Impact Team worked with human rights experts to map Twinings’ value chain against every human rights risk (as defined by the International Bill of Rights) and consider how each group could be negatively impacted. This was complemented and enhanced with a thorough document review and interviews to explore how human rights risks manifest in specific areas of the value chain”. It also indicates that ‘the categorisation of the right holders in the Twinings value chain ranged from corporate functions to tea estates and raw materials farmers’. [Corporate Responsibility Report 2018, 06/11/2018: <a href="http://abf.co.uk">abf.co.uk</a>]</li> <li>• Met: Identifying risks in AG suppliers: As indicated above, the risk process for Twinings included whole operations and supply chain. Moreover, Allied Bakeries, part of ABF Grocery division, “conducted a risk assessment of the supply base for risks of modern slavery”. [Corporate Responsibility Report 2018, 06/11/2018: <a href="http://abf.co.uk">abf.co.uk</a> &amp; CR Update 2018, 06/11/2018: <a href="http://abf.co.uk">abf.co.uk</a>]</li> <li>• Not met: Identifying risks in AP suppliers: The Company indicates that Primark ‘audits allow us to get an extremely detailed picture of working conditions across the factory ...’. However, this seems to refer to compliance monitoring. No evidence found in relation to the actual process followed to identify which are the potential human rights risks in the apparel supply chain. [Conducting checks and audits Primark UK, 09/07/19: <a href="http://primark.com">primark.com</a> &amp; Primark Global Sourcing Map, 11/07/19: <a href="http://globalsourcingmap.primark.com">globalsourcingmap.primark.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Ongoing global risk identification: The company indicates that ‘our businesses have undertaken a risk assessment process to understand which supply chains may be at higher risk of modern slavery. This may be due to the country of origin, the product or industry characteristics (such as seasonal cycles) or workforce characteristics (such as migrant workers). Our businesses are now working on developing action plans for any supply chains which may be at higher risk of forced labour’. However, no description found of the global systems in place to identify its human rights risks and impacts. [CR Update 2018, 06/11/2018: <a href="http://abf.co.uk">abf.co.uk</a>]</li> <li>• Not met: In consultation with stakeholders: Only found for one company brand [Additional disclosures to CHRB, 11/2016]</li> <li>• Met: In consultation with HR experts: The company indicates that “our current risk assessment is supplemented with access to the Supplier Ethical Data Exchange (Sedex) and Maplecroft’s risk assessment tool, which gives us an insight into some of our supply chains and suppliers with the highest risk”. [CR Update 2018, 06/11/2018: <a href="http://abf.co.uk">abf.co.uk</a>]</li> <li>• Not met: Triggered by new circumstances</li> <li>• Not met: Explains use of HRIAs or ESIA (inc HR)</li> </ul>
B.2.2	Assessing: Assessment of risks and impacts identified (salient risks and key industry risks)	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Salient risk assessment (and context): In the context of modern slavery &amp; human trafficking, the Company discloses the following process: ‘All our business have gone through a risk assessment process to understand which supply chains may be at higher risk of modern slavery. This may be due to the country of origin, the product or industry characteristics (such as seasonal lifecycles) or workforce characteristics</li> </ul>

			<p>(such as migrant workers)'. It also indicates that 'our current risk assessment is supplemented with access to Sedex and Maplecroft's risk assessment tools, which gives us an insight into some of our supply chains and suppliers with the highest risk'. It also indicates that 'the risk of modern slavery is not confined to our supply chains, we also scrutinise our own hiring practices'. Finally, the Company is carrying out a process to assess the human rights risks in its brand Twinings including different categories of affected holders ranging from corporate functions to tea estates and raw material farmers. [Modern slavery statement, 2017 &amp; Corporative Responsibility Report 2018, 06/11/2018: <a href="http://abf.co.uk">abf.co.uk</a>]</p> <ul style="list-style-type: none"> <li>• Met: Public disclosure of salient risks: Following the process described in B.2.1 for the Twinings brand operations, the assessment allowed "to create a list of the most salient human rights risks to its business: gender issues (discrimination harassment and abuse); children's rights; health, safety and security at work; plantation community needs and living standards; forced labour; and working hours, remuneration and benefits". [Corporative Responsibility Report 2018, 06/11/2018: <a href="http://abf.co.uk">abf.co.uk</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Both requirements under score 1 met</li> </ul>
B.2.3	Integrating and Acting: Integrating assessment findings internally and taking appropriate action	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Action Plans to mitigate risks: As indicated below, one of the companies of the Group carried out an assessment and will implement measures to manage the different risks identified. However, no evidence found of a systematic management plan to mitigate human rights risks assessed across the whole Group. [CR Update 2018, 06/11/2018: <a href="http://abf.co.uk">abf.co.uk</a>]</li> <li>• Not met: Including in AG supply chain</li> <li>• Not met: Including in AP supply chain</li> <li>• Not met: Example of Actions decided: The Company indicates that 'Twinings recently undertook a human rights assessment of its whole operations [...] over the coming year, Twinings will be reviewing and integrating the recommendations'. It also states that, following the assessment, 'Twinings will review and integrate the recommendations in the report to attempt to mitigate these salient risks, while continuing to address these issues through the work already in place'. However, no evidence found in relation to actual examples of actions carried out to mitigate the risks identified and assessed. [CR Update 2018, 06/11/2018: <a href="http://abf.co.uk">abf.co.uk</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> </ul>
B.2.4	Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: System to check if Actions are effective</li> <li>• Not met: Lessons learnt from checking effectiveness</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both requirement under score 1 met</li> </ul>
B.2.5	Communicating: Accounting for how human rights impacts are addressed	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Comms plan re identifying risks</li> <li>• Met: Comms plan re assessing risks: The Company describes in indicator B.2.2 how it assesses human rights risks. It discloses the particular case of Twinings operations, disclosing all the salient human rights issues identified following the assessment. [Modern slavery statement, 2017 &amp; Corporative Responsibility Report 2018, 06/11/2018: <a href="http://abf.co.uk">abf.co.uk</a>]</li> <li>• Not met: Comms plan re action plans for risks</li> <li>• Not met: Comms plan re reviewing action plans</li> <li>• Not met: Including AG suppliers</li> <li>• Not met: Including AP suppliers</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Responding to affected stakeholders concerns</li> <li>• Not met: Ensuring affected stakeholders can access communications</li> </ul>

## C. Remedies and Grievance Mechanisms (15% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.1	Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Channel accessible to all workers: The Company has a whistleblowing policy. It states that: 'This policy applies to all individuals working at all levels of the organisation, including senior managers, officers, directors, employees, consultants, contractors, trainees, homeworkers, part-time and fixed-term workers, suppliers, casual and agency staff'. [Whistleblowing policy]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Number grievances filed, addressed or resolved: The Company indicates that 'between June 2015 and May 2016, our businesses received 118 notifications. The majority of these relate to low-level human resources (HR) grievances, theft or fraud'. However, no evidence found on number of human rights related grievances that were filed, addressed or resolved. No further information found in the CR Report 2018. [Corporate Responsibility 2016, 2016 &amp; CR Update 2018, 06/11/2018: <a href="http://abf.co.uk">abf.co.uk</a>]</li> <li>• Not met: Channel is available in all appropriate languages: No evidence found of the Company making it clear that channel is available in all appropriate languages. [Whistleblowing policy]</li> <li>• Not met: Expect AG supplier to have equivalent grievance systems</li> <li>• Not met: Opens own system to AG supplier workers: The Company indicated in its 2016 report that 'Illovo has committed to develop a grievance and dispute resolution procedure for stakeholders, including local communities and outgrowers, to allow individuals to raise areas of concern or grievances related to land anonymously and in their own language'. However, no evidence found of channels opened to all agricultural suppliers of Associated British Foods, including about any human right topic. [Corporate Responsibility 2016, 2016]</li> <li>• Not met: Expect AP supplier to have equivalent grievance systems</li> <li>• Not met: Opens own system to AP supplier workers</li> </ul>
C.2	Grievance channel(s)/mechanism(s) to receive complaints or concerns from external individuals and communities	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Grievance mechanism for community: The Modern Slavery policy indicates: 'Our whistleblowing policy sets out guidelines for individuals who wish to raise issues in confidence which could include forced labour concerns. We provide an external third party service for all staff, including casual or agency staff, and make every effort to protect the confidentiality of those who raise concerns'. In addition, Whistleblowing policy applies to, besides employees, consultants, contractors, trainees, homeworkers, part-time and fixed-term workers, suppliers, casual and agency staff'. However, it does not make clear whether all external individuals and communities who may be adversely impacted can raise concerns. The Company provided evidence that Illovo committed to develop a grievance procedure for stakeholders, including communities to raise concerns related to land, and in the 2018 update, Primark lists different channels to report a complain, including a website and employees at factories (suppliers). However, as indicated, is not clear that all external individuals and communities can access to grievance mechanisms to report concerns in relation to all the Company's businesses. [Modern Slavery and Human Trafficking Statement 2018, 31/10/2018: <a href="http://abf.co.uk">abf.co.uk</a> &amp; Whistleblowing policy]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Describes accessibility and local languages</li> <li>• Not met: Expects AG supplier to have community grievance systems: Primark indicates that 'It is essential that people and organisations can raise grievances directly with us and alert us to potential breaches of our Code of Conduct (...). Currently, people can do this through several channels: directly through the Primark website (...); through our whistleblowing facility which is available to all our employees, including casual or agency staff; and through confidential interviews with workers'. However, it is not clear that Primark also expects its suppliers to establish a mechanism for complaints or concerns from external individuals and communities, including about human rights issues related to the supplier, for their operations, and to convey the same expectation to their suppliers or those individuals or communities have access to the</li> </ul>

			<p>Company's own mechanisms to raise complaints or concerns about the Company's suppliers. It is not clear either that the webpage is open to anyone to file a complain. [CR Update 2018, 06/11/2018: <a href="http://abf.co.uk">abf.co.uk</a>]</p> <ul style="list-style-type: none"> <li>• Not met: AG supplier communities use global system</li> <li>• Not met: Expects AP supplier to have community grievance systems</li> <li>• Not met: AP supplier communities use global system</li> </ul>
C.3	Users are involved in the design and performance of the channel(s)/mechanism(s)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Engages users to create or assess system</li> <li>• Not met: Description of how they do this</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Engages with users on system performance</li> <li>• Not met: Provides user engagement example on performance</li> <li>• Not met: AG suppliers consult users in creation or assessment</li> <li>• Not met: AP suppliers consult users in creation or assessment</li> </ul>
C.4	Procedures related to the mechanism(s)/channel(s) are publicly available and explained	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Response timescales</li> <li>• Not met: How complainants will be informed</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Escalation to senior/independent level</li> </ul>
C.5	Commitment to non-retaliation over complaints or concerns made	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Public statement prohibiting retaliation</li> <li>• Not met: Practical measures to prevent retaliation</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Has not retaliated in practice</li> <li>• Not met: Expects AG suppliers to prohibit retaliation</li> <li>• Not met: Expects AP suppliers to prohibit retaliation</li> </ul>
C.6	Company involvement with State-based judicial and non-judicial grievance mechanisms	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Won't impede state based mechanisms</li> <li>• Not met: Complainants not asked to waive rights</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Will work with state based or non judicial mechanisms</li> <li>• Not met: Example of issue resolved (if applicable)</li> </ul>
C.7	Remedying adverse impacts and incorporating lessons learned	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <p>• Not met: Describes how remedy has been provided: The Company indicates that a study co-commissioned by Twinings, Oxfam and ETP regarding wages in Malawi 'showed that they are often too low to afford a good standard of living'. Following this, 'Twinings is committed to working with others to create a competitive Malawian tea industry where workers earn a living wage and smallholders can thrive'. The programme 'aims to improve smallholders farming practices', it also 'aims to improve their wage-setting process through greater worker representation, support a healthier workforce through the provision of fortified meals and provide greater opportunities for women'. 'Although it is still in early days, a new quality-based pricing structure has meant that farmers are producing better, more valuable product than ever before'. However, this is an example of improving human rights performance rather than providing remedy to people that has been victim of a human rights breach due to the Company's operations. The company also indicates, in its CR Update 2018, that "Primark is currently working to develop specific grievance mechanisms to provide workers in the supply chain access to remedy". However, no description found of the approach to be used to give timely remedy for victims of adverse human rights impacts caused by the company. [Corporate Responsibility Report 2018, 06/11/2018: <a href="http://abf.co.uk">abf.co.uk</a> &amp; Corporate Responsibility 2016, 2016]</p> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Says how it would remedy key sector risks</li> <li>• Not met: Changes introduced to stop repetition</li> <li>• Not met: Approach to learning from incident to prevent future impacts</li> <li>• Not met: Evaluation of the channel/mechanism</li> </ul>

## D. Performance: Company Human Rights Practices (20% of Total)

### D.1 Agricultural Products

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.1.1.a	Living wage (in own agricultural operations)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Pays living wage or sets target date: Primark (a subsidiary of the company) is a founding member of ACT (Action, Collaboration, Transformation), an initiative involving international brands and retailers, manufacturers and trade unions to address the issue of living wages in the textile and garment supply. However, no further details found. The company states, in its CR update 2018, that 'Twinings is part of the Malawi 2020 coalition led by Oxfam, the Ethical Tea Partnership (ETP) and the Sustainable Trade Initiative (IDH). This coalition aims to create a sustainable and competitive tea industry in Malawi, in which tea farmers receive a living wage, live healthier lives and have equal opportunities. However, no evidence found of a target timeframe for paying all workers a living wage. Also, evidence needs to refer to the Company's own employees. [Corporate responsibility update, 2017 &amp; Corporate Responsibility Report 2018, 06/11/2018: <a href="http://abf.co.uk">abf.co.uk</a>]</li> <li>• Not met: Describes how living wage determined</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Paying living wage</li> <li>• Not met: Definition of living wage reviewed with unions</li> </ul>
D.1.1.b	Living wage (in the supply chain)	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Living wage in supplier code or contracts: The Company has a suppliers' code of conduct in which it commits to paying living wages and states that non-compliance with its code may lead to the Company to request corrective actions or termination of agreement should any supplier and representatives not comply with the code (similar commitment in Primark's supplier code). [Supplier code of conduct: <a href="http://abf.co.uk">abf.co.uk</a> &amp; Additional disclosures to CHRB, 11/2016]</li> <li>• Met: Improving living wage practices of suppliers: The company indicates that "Since 2015, Twinings has been working as part of Malawi Tea 2020, a coalition of industry partners, unions, government agencies and non-governmental organisations (NGOs). Led by the Ethical Tea Partnership (ETP), the Sustainable Trade Initiative (IDH), Oxfam, the Tea Association of Malawi (TAML) and GIZ (German Development Agency), the programme aims to create a competitive Malawian tea industry in which workers receive a living wage and farmers thrive. Malawi Tea 2020's roadmap focuses on drivers such as training farmers in good agricultural practices, improving the wage-setting process through greater worker representation in unions [...] The first ever collective bargaining agreement for the Malawi tea industry, in 2016, provided a big wage increase for tea workers, followed by others in 2017 and 2018. However, inflation remains very high and erodes the purchasing power of wage increases, making closing the gap to a living wage difficult. At Twinings, we will continue ensuring we provide a fair price to producers that enable them to work toward payment of the living wage. [Progress Report 2018 - Twining, 2018: <a href="http://abf.co.uk">abf.co.uk</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Both requirements under score 1 met</li> <li>• Not met: Provides analysis of trends demonstrating progress</li> </ul>
D.1.2	Aligning purchasing decisions with human rights	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Avoids business model pressure on HRs (purchasing practices): No description of practices adopted to avoid price and short notice requirements was found in last three reporting years. [CR Update 2018, 06/11/2018: <a href="http://abf.co.uk">abf.co.uk</a>]</li> <li>• Not met: Positive incentives to respect human rights (purchasing practices)</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> </ul>
D.1.3	Mapping and disclosing the supply chain	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Identifies suppliers back to manufacturing sites (factories or fields)</li> </ul>

			<p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Discloses significant parts of SP and why: The company indicates that 'this year, Primark published its Global Sourcing Map which shows information about the factories which manufacture products for Primark. Details include factory names, addresses, the number of workers and gender split of the workforce'. Moreover, 'Twinings produced a sourcing map, which details where products – from peppermint to packaging – are sourced'. However, it is not clear that ABF discloses the mapping for the most significant parts of its supply chain. CHRB also looks for an explanation of how it has defined what are the most significant parts of its supply chain. No further information found. [Twinings Supply Chain Map, 09/07/19: <a href="http://sourcedwithcare.com">sourcedwithcare.com</a> &amp; CR Update 2018, 06/11/2018: <a href="http://abf.co.uk">abf.co.uk</a>]</li> </ul>
D.1.4.a	Prohibition on child labour: Age verification and corrective actions (in own agricultural operations)	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Does not use child labour: The Company indicates in its public submission to CHRB that 'In compliance with the relevant International Labour Organization (ILO) Standards, whenever any of our businesses hires a new employee we undertake age verification. If an applicant is below the legal working age, we would not employ them'. [Additional disclosures to CHRB, 11/2016]</li> <li>• Met: Age verification of job applicants and workers: See above.</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Remediation if children identified: AB Sugar, an ABF subsidiary, indicates that 'this year, we created a modern slavery animation to raise awareness and explain in a clear and concise way the different types of modern slavery (including child labour, forced labour and bonded labour) and explain them in the context of AB Sugar and the sugar industry'. However, no further information about how ABF remedies the issue of child labour if identified in its own agricultural operations. [AB Sugar Modern Slavery - A Global Commitment To Human Rights, 10/07/19: <a href="http://absugar.com">absugar.com</a>]</li> </ul>
D.1.4.b	Prohibition on child labour: Age verification and corrective actions (in the supply chain)	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Child Labour rules in codes or contracts: The Company has a suppliers' code of conduct in which it states that suppliers should not use child labour. Further guidelines include for suppliers to 'develop or participate and contribute to policies and programmes which provide for the transition of any child found to be performing child labour to enable her or him to attend and remain in quality education until no longer a child', avoiding night or hazardous work for children and young persons under 18 and compliance with 'the relevant International Labour Organization (ILO) standards'. It states that non-compliance with its code may lead to the Company to request corrective actions or termination of agreement should any supplier and representatives not comply with the code. The Company states that the supplier code of conduct is always included in contractual terms whenever it enters into a relationship with a supplier. [Supplier code of conduct: <a href="http://abf.co.uk">abf.co.uk</a> &amp; Additional disclosures to CHRB, 11/2016]</li> <li>• Not met: How working with suppliers on child labour</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> <li>• Not met: Analysis of trends in progress made</li> </ul>
D.1.5.a	Prohibition on forced labour: Debt bondage and other unacceptable financial costs (in own agricultural operations)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Pays workers in full and on time: In its 2017 Modern Slavery Statement, the Company has indicated that 'Employment is freely chosen: There is no forced or compulsory labour in any form, including bonded, trafficked, or prison labour. Workers are not required to lodge 'deposits' or their identity papers with their employer and are free to leave their employer after reasonable notice.' However, no evidence found in relation to commitment to pay regularly, in full and on time. [Modern Slavery and Human Trafficking Statement 2018, 31/10/2018: <a href="http://abf.co.uk">abf.co.uk</a> &amp; Modern slavery statement, 2017]</li> <li>• Not met: Payslips show any legitimate deductions</li> </ul>

			<p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: How these practices are implemented and monitored for agencies, labour brokers or recruiters: It also states that in addition ' a number of individual businesses have created a tailored approach to tackle modern slavery. (...) within our Grocery division, some businesses are following the Stronger Together guidance to develop and enhance policy. Their Preventing Hidden Labour Exploitation policy specifies the measures taken to limit the possibility of hidden worker exploitation taking place at any site. It builds on current Human Resources (HR) practice, outlines training intent and requires suppliers to operate according to the same principle. Furthermore, other businesses are aiming to enhance policy to support the identification of root causes of modern slavery and to develop and improve grievance mechanisms for workers. Primark now includes mandatory confidential worker interviews as part of their audit protocol'. It also reported that 'some of our businesses, like Twinings, are also planning to conduct a workshop with local HR teams which will include specific guidance on recruitment practices, working with recruitment agencies and labour contractors. However, it is not clear whether to this day, the Company monitors in a general basis these financial practices, particularly regarding employment agencies and other recruitment intermediaries in its own operations. [Modern slavery statement, 2017]</li> </ul>
D.1.5.b	Prohibition on forced labour: Debt bondage and other unacceptable financial costs (in the supply chain)	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Debt and fees rules in codes or contracts: The Company has indicated in its supplier code of conduct that 'there is no forced, bonded or involuntary prison labour. Workers are not required to lodge 'deposits' or their identity papers with their employer and are free to leave their employer after reasonable notice'. It states that non-compliance with its code may lead to the Company to request corrective actions or termination of agreement should any supplier and representatives no comply with the code. The Company indicates that the supplier code of conduct is always included in its contractual terms whenever it enters into a relationship with a supplier. [Supplier code of conduct: <a href="http://abf.co.uk">abf.co.uk</a> &amp; Additional disclosures to CHRB, 11/2016]</li> <li>• Not met: How working with suppliers on debt &amp; fees</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> <li>• Not met: Analysis of trends in progress made</li> </ul>
D.1.5.c	Prohibition on forced labour: Restrictions on workers (in own agricultural operations)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Does not retain documents or restrict movement: AB Sugar indicates that 'this year, we created a modern slavery animation to raise awareness and explain in a clear and concise way the different types of modern slavery (including child labour, forced labour and bonded labour) and explain them in the context of AB Sugar and the sugar industry'. However, the methodology is looking for evidence that the company, in all its own agricultural activities (beyond AB sugar) does not retain workers documents or that it does not restrict workers freedom of movement outside working hours or that the company requires to stay and pay for accommodation by the company. No further evidence found. [AB Sugar Modern Slavery - A Global Commitment To Human Rights, 10/07/19: <a href="http://absugar.com">absugar.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: How these practices are monitored for agencies, labour brokers or recruiters</li> </ul>
D.1.5.d	Prohibition on forced labour: Restrictions on workers (in the supply chain)	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Free movement rules in codes or contracts: As indicated in previous indicators, the supplier code includes guidelines and requirements regarding freedom of movement: 'Workers are not required to lodge 'deposits' or their identity papers with their employer and are free to leave their employer after reasonable notice'. [Supplier code of conduct: <a href="http://abf.co.uk">abf.co.uk</a>]</li> <li>• Not met: How working with suppliers on free movement</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> <li>• Not met: Provides analysis of trends demonstrating progress</li> </ul>

D.1.6.a	Freedom of association and collective bargaining (in own agricultural operation)	0	<p>The individual elements of the assessment are met or not as follows: Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Commits not to interfere with union rights / Steps to avoid intimidation or retaliation: Twinings Ovaltine Code of Conduct states that 'Workers, without distinction, have the right to join or form trade unions of their own choosing and to bargain collectively'. Also, in Illovo Code of Conduct, it is stated that 'Workers' representatives should not be discriminated against and should be allowed to carry out their representative functions in the workplace in accordance with recognition agreements concluded between management and the respective trade unions'. However, no evidence found for all agricultural business (or one statement covering all agricultural activities) of a commitment not to interfere with the rights of workers to join or to form trade unions and to bargain collectively as well as commitment to put into place measures to explicitly prohibit retaliation against workers seeking to exercise these rights. [Illovo Sugar Code of Conduct, 10/07/19: <a href="http://illovosugarafrika.com">illovosugarafrika.com</a> &amp; Twinings Code of Conduct, n/a: <a href="http://twinings.co.uk">twinings.co.uk</a>]</li> <li>• Not met: Discloses % covered by collective bargaining agreements</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> </ul>
D.1.6.b	Freedom of association and collective bargaining (in the supply chain)	0	<p>The individual elements of the assessment are met or not as follows: Score 1</p> <ul style="list-style-type: none"> <li>• Not met: FoA &amp; CB rules in codes or contracts: The Company indicates in its suppliers' code of conduct that 'workers, without distinction, have the right to join or form trade unions of their own choosing and to bargain collectively. The employer adopts an open attitude towards the activities of trade unions and their organisational activities. Workers, representatives are not discriminated against and have access to carry out their representative functions in the workplace. Where the right to freedom of association and collective bargaining is restricted under law, the employer facilitates, and does not hinder, the development of parallel means for independent and free association and bargaining'. However, no evidence found on guidelines containing requirements of prohibition of harassment and retaliation against union members and representatives. Although the code refers to no harassment or inhumane treatment, commitment against harassment/retaliation needs to be in context or mention union members/representatives. [Supplier code of conduct: <a href="http://abf.co.uk">abf.co.uk</a> &amp; Additional disclosures to CHRB, 11/2016]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: How working with suppliers on FoA and CB</li> <li>• Not met: Both requirements under score 1 met</li> <li>• Not met: Provides analysis of trends demonstrating progress</li> </ul>
D.1.7.a	Health and safety: Fatalities, lost days, injury rates (in own agricultural operations)	1	<p>The individual elements of the assessment are met or not as follows: Score 1</p> <ul style="list-style-type: none"> <li>• Met: Injury Rate disclosures: The company indicates that in 2018, the injury rate was 0.63%. [CR Update 2018, 06/11/2018: <a href="http://abf.co.uk">abf.co.uk</a>]</li> <li>• Met: Lost days or near miss disclosures: The company indicates that "during 2018, we recorded 833 Lost Time Injuries to employees - which is an 8% increase compared with last year. The number of injuries equates to a Lost Time Injury rate of 0.80%". [CR Update 2018, 06/11/2018: <a href="http://abf.co.uk">abf.co.uk</a>]</li> <li>• Met: Fatalities disclosures: The Company reports 4 fatalities in 2018. [CR Update 2018, 06/11/2018: <a href="http://abf.co.uk">abf.co.uk</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Set targets for H&amp;S performance: The Company reports fatalities and reportable injuries and provides an explanation of the figures provided. It has indicated its 'goals remain to eliminate fatalities and continuously improve our safety performance'. However, no specific evidence found in relation to targets related to injury/lost days/fatalities for the reporting period. [CR Update 2018, 06/11/2018: <a href="http://abf.co.uk">abf.co.uk</a>]</li> <li>• Not met: Met targets or explains why not: The company indicates that 'having safe working practices is fundamental to the success of Associated British Foods and our aim is zero harm'. However, it is not clear if the company has set targets explicitly related to rates of injury, lost days and fatalities for the reporting period. [CR Update 2018, 06/11/2018: <a href="http://abf.co.uk">abf.co.uk</a>]</li> </ul>



D.1.7.b	Health and safety: Fatalities, lost days, injury rates (in the supply chain)	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Sets out clear Health and Safety requirements: The supplier code of conduct contains requirements on health and safety, including take steps to prevent accidents, receiving regular training, access to toilet facilities and clean water, establishing senior manager responsibility on health and safety within supplier operations. [Supplier code of conduct: <a href="http://abf.co.uk">abf.co.uk</a>]</li> <li>• Not met: Injury Rate disclosures</li> <li>• Not met: Lost days or near miss disclosures</li> <li>• Not met: Fatalities disclosure</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: How working with suppliers on H&amp;S</li> <li>• Not met: Provides analysis of trends demonstrating progress</li> </ul>
D.1.8.a	Land rights: Land acquisition (in own agricultural operations)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Approach to identification of land tenure rights holders: The Company reports in relation to a project in Mozambique to raise 'awareness among farmers about their rights under Mozambique's land laws; record the rights of smallholder farmers through an open, participatory process of community land mapping; create a robust grievance mechanism for community and farmers association members'. However, no evidence found on how the Company, in the context of land acquisition and resettlements for its own operations, identifies tenure right holders, including through the engagement of affected communities. [Illovo Group Guidelines on Land and Land Rights, 10/07/19: <a href="http://illobosugarafrika.com">illobosugarafrika.com</a> &amp; AB Sugar Land Project, 10/07/19: <a href="http://absugar.com">absugar.com</a>]</li> <li>• Not met: Approach to doing so if no recent land deals: The Company indicates in its Guidelines on land that 'Historically, Illovo has not engaged in agricultural land acquisitions. Our business practices seek to avoid the transfer of land rights away from local communities [...] in relation to any green-field or other project involving land acquisitions we will conduct detailed environmental and social impact assessments, engage with all affected stakeholders, and as first priority, avoid the displacement of any persons from the land, or where displacement cannot be avoided, ensure that the free, prior and informed consent of all the affected persons is obtained and that the appropriate and agreed compensation is paid'. It goes on indicating that 'stakeholder engagement with local communities and other stakeholders must be conducted in a structured and culturally appropriate manner, taking into account the risks and impacts, the issues involved, the language preferences of the people affected and their decision-making processes as well as the needs of disadvantaged and vulnerable groups. The stakeholder engagement process must be free from external manipulation, interference, coercion and intimidation'. However, no evidence found on the actual steps to identify tenure rights, only how it should be conducted'. [Illovo Group Guidelines on Land and Land Rights, 10/07/19: <a href="http://illobosugarafrika.com">illobosugarafrika.com</a> &amp; AB Sugar Land Project, 10/07/19: <a href="http://absugar.com">absugar.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: How valuation and compensation works</li> <li>• Not met: Follows IFC5 in any state land deals</li> <li>• Not met: Describes approach if no recent land deals</li> </ul>
D.1.8.b	Land rights: Land acquisition (in the supply chain)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Rules on land &amp; owners in codes or contracts: In its suppliers' Code of Conduct, the Company only refers to suppliers having to commit to free prior and informed consent for all but does not refer to the identification of legitimate tenure rights holders, with particular attention to vulnerable groups.</li> </ul> <p>Illovo's policy on land and land rights apply to suppliers. No evidence found, however, of the Company applying similar practices for all its relevant businesses. [Supplier code of conduct: <a href="http://abf.co.uk">abf.co.uk</a> &amp; Illovo guidelines on land and land Rights: <a href="http://illobosugarafrika.com">illobosugarafrika.com</a>]</p> <ul style="list-style-type: none"> <li>• Not met: How working with suppliers on land issues</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> <li>• Not met: Provides analysis of trends demonstrating progress</li> </ul>

D.1.9.a	Water and sanitation (in own agricultural operations)	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Action to prevent water and sanitation risks: The Company indicates that communities are included in water-related risks assessments: 'For most of our businesses, we share water with others in the local community. Their needs and impacts on the water sources are vital to our long-term assessments of water availability and quality for all. We are also cognizant of social flow requirements downstream our operations. For example, Twinings is committed to support tea communities through housing, sanitation, water and hygiene [...]'</li> </ul> <p>Twinings aims to achieve at least a 50% reduction in waterborne diseases by providing households with sanitary latrines, improving the water retention capacity of catchment areas, installing systems to supply filtered water closer to the homes and conducting hygiene awareness and education campaigns'. [CDP Water Report 2018, 2018: <a href="http://abf.co.uk">abf.co.uk</a>]</p> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Water targets considering local factors: Although the Company reports in relation to water targets for some of its businesses and locations, no details found in relation to these targets being made taking into account water use by local communities and other users in the vicinity. [CDP Water Report 2018, 2018: <a href="http://abf.co.uk">abf.co.uk</a>]</li> <li>• Not met: Reports progress and shows trends in progress made</li> </ul>
D.1.9.b	Water and sanitation (in the supply chain)	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Rules on water stewardship in codes or contracts: The company indicates in its Supplier Code that 'access to clean toilet facilities and to potable water, and, if appropriate, sanitary facilities for food storage shall be provided. Accommodation, where provided, shall be clean, safe, and meet the basic needs of the workers'. However, no evidence of a requirement to refrain from negatively affecting access to safe water, in the context of impact to the surrounding communities, was found. [Supplier code of conduct: <a href="http://abf.co.uk">abf.co.uk</a>]</li> <li>• Met: How working with suppliers on water stewardship issues: The company claims that "Twinings (a subsidiary) began working on these issues with tea communities in Darjeeling in 2010. Over the last two years, in partnership with Mercy Corps and one of our key producers, GoodRicke, we have achieved a 79% decrease in waterborne diseases in participating tea communities (compared to the baseline conducted in 2016). Also, "in both Assam and Darjeeling, we work in partnership with producers who are also co-funding the work, as it ensures the infrastructure will be maintained in the future". The Company describes the specific work carried out in tea gardens, including the consequences in terms of disease, medical expenses, etc. [Progress Report 2018 - Twining, 2018: <a href="http://abf.co.uk">abf.co.uk</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> <li>• Not met: Provides analysis of trends demonstrating progress</li> </ul>
D.1.10.a	Women's rights (in own agricultural operations)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Process to stop harassment and violence against women [Corporate Responsibility 2016, 2016 &amp; Corporate Responsibility Report 2018, 06/11/2018: <a href="http://abf.co.uk">abf.co.uk</a>]</li> <li>• Not met: Working conditions take account of gender: One of its subsidiaries, Twinings indicates that "we have worked with BSR (Business for Social Responsibility) to review our systems and policies, including our Code of Conduct and TCNA framework, self assessment questionnaire and supplier guidance documents, to ensure they take account of gender-specific issues. For example, this will ensure we take account of the many obstacles women face. For example, women often have other household and family duties after work, so if they are to have the same access to training opportunities as men, it is essential that training sessions are organised during working hours and not after". However, it is not a general company policy, it was only found in its subsidiary, Twining, and it only covers a very specific need. No other evidence of working conditions taken account of gender was found. [Progress Report 2018 - Twining, 2018: <a href="http://abf.co.uk">abf.co.uk</a>]</li> </ul>

			<ul style="list-style-type: none"> <li>• Not met: Equality of opportunity at all levels of employment: The Company indicates that 'we have a group wide Gender Diversity Task Force, comprised of representatives from each division who meet regularly to share knowledge, resources and case studies on activities that have been successful. The group's overarching purpose is stated as: "No-barriers to talent". The divisional CEO's are responsible for the work of the task force with accountability for ensuring delivery. It also has a Two-way Mentoring programme, which aims to develop the confidence and capabilities of female workers, based in 19 countries. The Company reports evidence from women empowerment in Illovo, where women with senior responsibilities is 19%, board 25% and is increasing 'female representation in the historically male-dominated engineering sector, through its management training programme. This has led to an increase in the number of women in senior engineering roles in its factories'. This indicator looks for a company overall process and it is not clear, however, if this has been monitored and maintained throughout all levels of employment in the company's other businesses or if just in senior management roles at Illovo. [Corporate Responsibility 2016, 2016 &amp; CR Update 2018, 06/11/2018: <a href="http://abf.co.uk">abf.co.uk</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Meet all requirements under score 1</li> </ul>
D.1.10.b	Women's rights (in the supply chain)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Women's rights in codes or contracts [Corporate responsibility update, 2017 &amp; CR Update 2018, 06/11/2018: <a href="http://abf.co.uk">abf.co.uk</a>]</li> <li>• Not met: How working with suppliers on women's rights: It provides an example of training women smallholder farmers to improve yields as part of the Cotton Connect programme. The Company also indicated (2016 report) that it works, through Primark, in a partnership with the DFID (UK's department for international development) to improve health and wellbeing of local workers in five of Primark's major markets: Bangladesh, Pakistan, Myanmar, Ethiopia, and India. One of the key areas of work is women's economic empowerment: 'supporting the empowerment of women factory workers in global supply chains to eliminate issues surrounding health, housing, gender inequality, career progression and skills (vocational and life)'. Moreover, in the CR Report 2019, the company indicates that 'in July 2017, Twinings made a commitment at the Family Planning summit in London, to reach 40,000 women in its supply chain in Kenya with reproductive health and family planning programmes. This built upon work started a number of years ago to address women's health and empowerment in the supply chain. So far 6,267 women workers and farmers have been reached'. However, it is not clear how this translates into improving supplier's practices in relation to women's rights. [Corporate Responsibility 2016, 2016 &amp; Corporative Responsibility Report 2018, 06/11/2018: <a href="http://abf.co.uk">abf.co.uk</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> <li>• Not met: Provides analysis of trends demonstrating progress</li> </ul>

## D.2 Apparel

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.2.1.b	Living wage (in the supply chain)	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Living wage in supplier code or contracts: The Company has a suppliers' code of conduct in which it commits to paying living wages and states that non-compliance with its code may lead to the Company to request corrective actions or termination of agreement should any supplier and representatives not comply with the code (similar commitment in Primark's supplier code). [Supplier code of conduct: <a href="http://abf.co.uk">abf.co.uk</a> &amp; Additional disclosures to CHRB, 11/2016]</li> </ul>

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			<ul style="list-style-type: none"> <li>• Met: Improving living wage practices of suppliers: Primark and other retailers founded the ACT (Action, Collaboration, Transformation on Living Wages) initiative to provide a global framework on living wages in the garment sector. The initiative aims to improve wages in the global garment sector by establishing industry-wide collective bargaining in sourcing countries, supported by responsible purchasing practices'. 'Primark has publicly stated its commitment to purchasing practices supporting long-term partnerships with manufacturers, enabling and regarding their progress to paying living wages'. In 2017, the ACT (Primark's sourcing team are members of the ACT Working Group) piloted a tool to identify the purchasing practices that have the greatest impact on a living wage. The process has relied on the consultation and engagement with suppliers and other stakeholders. No further information found in the CR Report 2018. [Corporate responsibility update, 2017 &amp; CR Update 2018, 06/11/2018: <a href="http://abf.co.uk">abf.co.uk</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Both requirements under score 1 met: as above</li> <li>• Not met: Provide analysis of trends demonstrating progress</li> </ul>
D.2.2	Aligning purchasing decisions with human rights	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Avoids business model pressure on HRs: No description of practices adopted to avoid business model pressure on human rights found. No further information found in the CR Update Report 2018. [Corporate Responsibility Report 2018, 06/11/2018: <a href="http://abf.co.uk">abf.co.uk</a> &amp; CR Update 2018, 06/11/2018: <a href="http://abf.co.uk">abf.co.uk</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Positive incentives to respect human rights</li> <li>• Not met: Both requirements under score 1 met</li> </ul>
D.2.3	Mapping and disclosing the supply chain	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Identifies suppliers back to product source: The Company has disclosed the supplier map of Primark. [Primark Global Sourcing Map, 11/07/19: <a href="http://globalsourcingmap.primark.com">globalsourcingmap.primark.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Discloses significant parts of supply chain and why: The Company has disclosed the supplier map of Primark. [Primark Global Sourcing Map, 11/07/19: <a href="http://globalsourcingmap.primark.com">globalsourcingmap.primark.com</a>]</li> </ul>
D.2.4.b	Prohibition on child labour: Age verification and corrective actions (in the supply chain)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Child Labour rules in codes or contracts: Primark's code for suppliers states that 'there shall be no recruitment of child labour'. 'Companies shall develop or participate in and contribute to policies and programmes which provide for the transition of any child found to be performing child labour to enable her or him to attend and remain in quality education until no longer a child'. 'Children and young persons under 18 shall not be employed at night or in hazardous conditions'. No evidence found, however of guidelines in relation to age verification of job applicants and workers. [Primark Supplier code of conduct, 02/2017: <a href="http://primark.a.bigcontent.io">primark.a.bigcontent.io</a> &amp; Additional disclosures to CHRB, 11/2016]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: How working with suppliers on child labour</li> <li>• Not met: Both requirements under score 1 met</li> <li>• Not met: Provide analysis of trends demonstrating progress</li> </ul>
D.2.5.b	Prohibition on forced labour: Debt bondage and other unacceptable financial costs (in the supply chain)	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Debt and fees rules in codes or contracts: Primark's code for suppliers states that 'there is no forced or compulsory labour in any form, including bonded, trafficked, or prison labour'. 'Workers are not required to lodge "deposits" or their identity papers with their employer and are free to leave their employer after reasonable notice'. [Primark Supplier code of conduct, 02/2017: <a href="http://primark.a.bigcontent.io">primark.a.bigcontent.io</a> &amp; Additional disclosures to CHRB, 11/2016]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: How working with suppliers on debt &amp; fees</li> <li>• Not met: Both requirements under score 1 met</li> <li>• Not met: Provide analysis of trends in progress made</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.2.5.d	Prohibition on forced labour: Restrictions on workers (in the supply chain)	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Free movement rules in codes or contracts: Primark's code for supplies states that 'there is no forced or compulsory labour in any form, including bonded, trafficked, or prison labour'. 'Workers are not required to lodge "deposits" or their identity papers with their employer and are free to leave their employer after reasonable notice'. [Primark Supplier code of conduct, 02/2017: <a href="http://primark.a.bigcontent.io">primark.a.bigcontent.io</a>]</li> <li>• Not met: How these practices are implemented and monitored for agencies, labour brokers or recruiters</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> <li>• Not met: Provide analysis of trends in progress made</li> </ul>
D.2.6.b	Freedom of association and collective bargaining (in the supply chain)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: FoA &amp; CB rules in codes or contracts: The Company indicates in its suppliers' code of conduct that 'workers, without distinction, have the right to join or form trade unions of their own choosing and to bargain collectively. The employer adopts an open attitude towards the activities of trade unions and their organisational activities. Workers, representatives are not discriminated against and have access to carry out their representative functions in the workplace. Where the right to freedom of association and collective bargaining is restricted under law, the employer facilitates, and does not hinder, the development of parallel means for independent and free association and bargaining'. However, no evidence was found of guidelines containing requirements of prohibition of harassment and retaliation against union members and representatives. The Code for suppliers is part of contractual agreements. [Primark Supplier code of conduct, 02/2017: <a href="http://primark.a.bigcontent.io">primark.a.bigcontent.io</a> &amp; Additional disclosures to CHRB, 11/2016]</li> <li>• Not met: How working with suppliers on FoA and CB</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> <li>• Not met: Provide analysis of trends in progress made</li> </ul>
D.2.7.b	Health and safety: Fatalities, lost days, injury rates (in the supply chain)	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Sets out clear Health and Safety requirements: The supplier code of conduct contains requirements on health and safety, including take steps to prevent accidents, receiving regular training, access to toilet facilities and clean water, establishing senior manager responsibility on health and safety within supplier operations. [Primark Supplier code of conduct, 02/2017: <a href="http://primark.a.bigcontent.io">primark.a.bigcontent.io</a>]</li> <li>• Not met: Injury rate disclosures</li> <li>• Not met: Lost days or near miss disclosures</li> <li>• Not met: Fatalities disclosures</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: How working with suppliers on H&amp;S</li> <li>• Not met: Provide analysis of trends in progress made</li> </ul>
D.2.8.b	Women's rights (in the supply chain)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Women's rights in codes or contracts: No further information found in the CR Update 2018. [Corporate Responsibility Report 2018, 06/11/2018: <a href="http://abf.co.uk">abf.co.uk</a>]</li> <li>• Not met: How working with suppliers on women's rights [Corporate Responsibility Report 2018, 06/11/2018: <a href="http://abf.co.uk">abf.co.uk</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both requirement under score 1 met</li> <li>• Not met: Provide analysis of trends in progress made</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.2.9.b	Working hours (in the supply chain)	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>Met: Working hours in codes or contracts: Both ABF and its subsidiary, Primark (through which all apparel activities are undertaken), do have suppliers' code of conduct which includes not working beyond excessive hours and state that 'workers shall not on a regular basis be required to work in excess of 48 hours per week and shall be provided with at least one day off for every seven-day period on average. Overtime shall be voluntary, shall not exceed 12 hours per week, shall not be demanded on a regular basis and shall always be compensated at a premium rate'. It states that non-compliance with its code may lead to the Company to request corrective actions or termination of agreement should any supplier and representatives not comply with the code. [Primark Supplier code of conduct, 02/2017: <a href="http://primark.a.bigcontent.io">primark.a.bigcontent.io</a> &amp; Supplier code of conduct: <a href="http://abf.co.uk">abf.co.uk</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>Not met: Both requirements under score 1 met</li> <li>Not met: Provide analysis of trends in progress made</li> </ul>

### E. Performance: Responses to Serious Allegations (20% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
E(1).0	Serious allegation No 1		No allegations meeting the CHRB severity threshold were found, and so the score of 19.34 out of 80 points scored in themes A-D & F has been applied to produce a score of 4.83 out of 20 points for theme E.

### F. Transparency (10% of Total)

Indicator Code	Indicator name	Score	Explanation
F.1	Company willingness to publish information	1.94 out of 4	Out of a total of 62 indicators assessed under sections A-D of the benchmark, Associated British Foods made data public that met one or more elements of the methodology in 30 cases, leading to a disclosure score of 1.94 out of 4 points.
F.2	Recognised Reporting Initiatives	0 out of 2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 2</p> <ul style="list-style-type: none"> <li>Not met: Company reports on GRI</li> <li>Not met: Company reports on SASB</li> <li>Not met: Company reports on UNGPRF</li> </ul>
F.3	Key, High Quality Disclosures	0 out of 4	<p>Associated British Foods met 0 of the 10 thresholds listed below and therefore gets 0 out of 4 points for the high quality disclosure indicator.</p> <p>Specificity and use of concrete examples</p> <ul style="list-style-type: none"> <li>Not met: Score 2 for A.2.2 : Board discussions</li> <li>Not met: Score 2 for B.1.6 : Monitoring and corrective actions</li> <li>Not met: Score 2 for C.1 : Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers</li> <li>Not met: Score 2 for C.3 : Users are involved in the design and performance of the channel(s)/mechanism(s)</li> </ul> <p>Discussing challenges openly</p> <ul style="list-style-type: none"> <li>Not met: Score 2 for B.2.4 : Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts</li> <li>Not met: Score 2 for C.7 : Remedying adverse impacts and incorporating lessons learned</li> </ul> <p>Demonstrating a forward focus</p> <ul style="list-style-type: none"> <li>Not met: Score 2 for A.2.3 : Incentives and performance management</li> <li>Not met: Score 2 for B.1.2 : Incentives and performance management</li> <li>Not met: Score 1 for D.1.1.a: Living wage (in own agricultural operations)</li> <li>Not met: Score 2 for D.1.7.a : Health and safety: Fatalities, lost days, injury rates (in own agricultural operations)</li> </ul>

#### Disclaimer

A score of zero for a particular indicator does not mean that bad practices are present. Rather it means that we have been unable to identify the required information in public documentation.

See the 2019 Key Findings report and technical annex for more details of the research process.

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