

**Company Name** Capri Holdings  
**Industry** Apparel (Supply Chain only)  
**Overall Score (\*)** 12.8 out of 100

Theme Score	Out of	For Theme
0.2	10	A. Governance and Policies
1.6	25	B. Embedding Respect and Human Rights Due Diligence
2.9	15	C. Remedies and Grievance Mechanisms
2.2	20	D. Performance: Company Human Rights Practices
5.0	20	E. Performance: Responses to Serious Allegations
0.9	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	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: General HRs commitment: The Company states on its website that it is "committed to principles of ethical business practice and recognition of the dignity of others, including responsible labor practices" and on its Code of Business Conduct and Ethics that indicates that they are "committed to a work environment in which all individuals are treated with respect, that we prohibit discriminatory practices and that we are committed to providing a safe, healthy and comfortable workplace for all employees". However, there is no explicit mention to human rights. [Supply Chain Disclosure, 2018: <a href="https://www.capri.com/s22.q4cdn.com">s22.q4cdn.com</a> &amp; Code of Business Conduct and Ethics, 01/01/2019: <a href="https://www.capri.com/s22.q4cdn.com">s22.q4cdn.com</a>]</li> <li>Not met: UNGC principles 1 &amp; 2</li> <li>Not met: UDHR</li> <li>Not met: International Bill of Rights</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>Not met: UNGPs</li> <li>Not met: OECD: Although the Company refers that adopt policies and procedures with respect to conflict minerals consistent with Capri's policy and practices set forth herein and the OECD Guidance, it does not mention about the OECD Guidelines for Multinational Enterprises and Human Rights. [Conflicts Minerals Policy, 01/01/2019: <a href="https://www.capri.com/s22.q4cdn.com">s22.q4cdn.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
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 states in its Code of Conduct for Business Partner that in its own operation and business partners should respect the legal rights of employees to freely and without harassment participate in worker organizations, shall not use any form of slave, forced or prison labor, must not use child labor and do not allow any form of improper discrimination. However, there is no evidence to respect the right to collective bargaining and also does not mention ILO, including own operations. [Code of Conduct for Business Partners, 01/01/2019: <a href="https://s22.q4cdn.com">s22.q4cdn.com</a>]</li> <li>• Not met: UNGC principles 3-6</li> <li>• Not met: Explicitly list ALL four ILO for AP suppliers: Although the Company states in its Code of Conduct for Business Partners that they should not allow prison or forced labor and child labor, should respect freedom of association and to do not allow any kind of discrimination. It is not explicitly described the right of collective bargaining. [Code of Conduct for Business Partners, 01/01/2019: <a href="https://s22.q4cdn.com">s22.q4cdn.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Explicit commitment to All four ILO Core</li> <li>• Met: Respect H&amp;S of workers: On its Code of Business Conduct and Ethics, the Company has a topic to describe that respect the H&amp;S of workers by saying that "the Company is committed to providing a safe, healthy and comfortable workplace for all employees. The Company will not knowingly permit unsafe conditions to exist, nor will it permit employees to engage in unsafe acts." [Code of Business Conduct and Ethics, 01/01/2019: <a href="https://s22.q4cdn.com">s22.q4cdn.com</a>]</li> <li>• Met: H&amp;S applies to AP suppliers: According to the Company's Code of Conduct for Business Partners, its "business partners must ensure that their workers are provided a safe and healthy work environment, and are not subject to unsanitary or hazardous conditions". [Code of Conduct for Business Partners, 01/01/2019: <a href="https://s22.q4cdn.com">s22.q4cdn.com</a>]</li> <li>• Not met: working hours for workers</li> <li>• Not met: Working hours for AP suppliers</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</li> <li>• Not met: Expecting suppliers to respect these rights</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: 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	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 stakeholder engagement</li> <li>• Not met: Regular stakeholder engagement</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</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: Although the Company states on the Supply Chain Disclosure that it requires corrective action to remedy deficiencies, there is no commitment from the Company to remedy the adverse impacts on individuals, workers and communities caused by its own operation. [Company website, Supply Chain Disclosure, 25/02/2019: <a href="https://capriholdings.com">capriholdings.com</a>]</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: The Company states on the Annual Report that: 'If one of our manufacturing contractors violates applicable labor or other laws, rules or regulations or implements labor or other business practices that are generally regarded as unethical in the United States, the shipment of finished products to us could be interrupted, orders could be cancelled, relationships could be terminated and our reputation could be damaged.' However, it does not describe that the Company work with business relationship to remedy adverse impacts. [Annual Report 2019, 2019: <a href="https://s22.q4cdn.com">s22.q4cdn.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <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)</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <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	<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: CEO or Board approves policy</li> <li>• Not met: Board level responsibility for HRs</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Speeches/letters by Board members or CEO</li> </ul>
A.2.2	Board discussions	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: Board/Committee review of salient HRs</li> <li>• Not met: Examples or trends re HR discussion</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both examples and process</li> </ul>
A.2.3	Incentives and performance management	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: Incentives for at least one board member</li> <li>• Not met: At least one key AP HR risk, beyond employee H&amp;S</li> </ul> <p>Score 2</p> <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	<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</li> <li>• Not met: Senior responsibility for HR: The Company indicates in its Code of Business Conduct and Ethics that any issue or conflict involving the employees must be reported to the Chief Human Resources Officer and Head of Internal Audit. However, no details found in relation to being responsible for human right-related policies or strategies. [Code of Business Conduct and Ethics, 01/01/2019: <a href="https://s22.q4cdn.com">s22.q4cdn.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Day-to-day responsibility</li> <li>• Not met: Day-to-day responsibility for AP in supply chain</li> </ul>
B.1.2	Incentives and performance management	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: Senior manager incentives for human rights</li> <li>• Not met: At least one key AP HR risk, beyond employee H&amp;S</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Performance criteria made public</li> </ul>
B.1.3	Integration with enterprise risk management	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: HR risks is integrated as part of enterprise risk system: The Company states on its Annual Report that, if they fail to comply with labor laws or collective bargaining agreements, or if their manufacturing contractors fail to use acceptable, ethical business practices, the business and reputation could suffer. However, there is no evidence that the Company integrates human rights to its risk management systems. [Annual Report 2019, 2019: <a href="https://s22.q4cdn.com">s22.q4cdn.com</a>]</li> </ul> <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	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</li> <li>• Not met: Communicates its policy to all workers in own operations</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Commits to all 4 ILO core conventions</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
	Company's own operations		<ul style="list-style-type: none"> <li>• Not met: Communication of policy commitments to stakeholder</li> <li>• Not met: How policy commitments are made accessible to audience</li> </ul>
B.1.4.b	Communication /dissemination of policy commitment(s) to business relationships	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 all 4 ILO core conventions for suppliers</li> <li>• Not met: Communicating policy down the whole AP supply chain</li> <li>• Not met: Requiring AP suppliers to communicate policy down the chain</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: How HR commitments made binding/contractual: The Company states in its Code of Conduct for Business Partners that if business partners failures to meet the standards in the code it will result in taking appropriate actions, up to and including termination of the business relationship. However, there is no evidence of binding arrangement and that to follow all the requirements on the Code of Conducts for Business Partners is part of the contract. [Code of Conduct for Business Partners, 01/01/2019: <a href="https://s22.q4cdn.com">s22.q4cdn.com</a>]</li> <li>• Not met: Including on AP suppliers [Code of Conduct for Business Partners, 01/01/2019: <a href="https://s22.q4cdn.com">s22.q4cdn.com</a>]</li> </ul>
B.1.5	Training on 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: Scores at least 1 on A.1.2</li> <li>• Not met: Trains all workers on HR policy commitments: The Company states in its supply chain disclosure that all employees are required to undergo compliance and ethics training, with respect to the Code of Business Conduct and Ethics. In addition, the Company's directors and officers are required to complete an annual certification attesting that they know and understand the requirements of the Code of Business Conducts and Ethics. However, in this Code in which the training is based on, there is no mention to human rights issues. [Supply Chain Disclosure, June, 2019: <a href="https://s22.q4cdn.com">s22.q4cdn.com</a> &amp; Code of Business Conduct and Ethics, 01/01/2019: <a href="https://s22.q4cdn.com">s22.q4cdn.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Trains relevant AP managers including procurement</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</li> <li>• Met: Monitoring AP suppliers: On the Company's Supply Chain Disclosure, it details the audit program under which factory audits of manufacturers are conducted by an independent third-party auditor. The independent third-party auditor evaluates, among other things, a manufacturer's compliance with wage, hour and labor laws and health, safety and environmental regulations, as well as the working and other conditions within the facility. [Supply Chain Disclosure, June, 2019: <a href="https://s22.q4cdn.com">s22.q4cdn.com</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: The Company indicates that it implements corrective action where a deficiency to meet the Supplier Code of Conduct is identified, in case of a serious violation, termination of the Company's relationship with the manufacturer may occur. However, the Company does not discloses the number of incidences and detail of the process. [Supply Chain Disclosure, June, 2019: <a href="https://s22.q4cdn.com">s22.q4cdn.com</a>]</li> <li>• Not met: Example of corrective action</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>• Met: HR affects AP selection of suppliers: The Company states in its Supply Chain Disclosure that it conducts "preliminary inspections of each new manufacturer's facilities and require detailed questionnaires from potential manufacturers. When assessing the risks of human trafficking and slavery at any one manufacturer, we also review that manufacturer's geographic location(s) and the nature of its manufacturing activities." [Supply Chain Disclosure, June, 2019: <a href="https://s22.q4cdn.com">s22.q4cdn.com</a>]</li> <li>• Met: HR affects on-going AP supplier relationships: The Company states that if some supplier failure to comply with Code of Conduct for Business Partners, corrective action may occur, up to and including termination of the Company's relationship with the manufacturer. [Supply Chain Disclosure, June, 2019: <a href="https://s22.q4cdn.com">s22.q4cdn.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			Score 2 <ul style="list-style-type: none"> <li>Met: Both requirement under score 1 met: See above.</li> <li>Not met: Working with AP suppliers to improve performance</li> </ul>
B.1.8	Approach to engagement with potentially affected stakeholders	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Not met: Stakeholder process or systems</li> <li>Not met: Frequency and triggers for engagement</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	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Not met: Identifying risks in own operations</li> <li>Not met: Identifying risks in AP suppliers</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Not met: Ongoing global risk identification</li> <li>Not met: In consultation with stakeholders</li> <li>Not met: In consultation with HR experts</li> <li>Not met: Triggered by new circumstances</li> </ul>
B.2.2	Assessing: Assessment of risks and impacts identified (salient risks and key industry risks)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Not met: Salient risk assessment (and context): Although the Company discloses that it fails to comply with labor laws or collective bargaining agreements, or if its manufacturing contractors fails to use acceptable, ethical business practices, the business and reputation could suffer, it does not specify what it considers to be salient HR issues. [Annual Report 2019, 2019: <a href="https://www.q4cdn.com">s22.q4cdn.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Not met: Public disclosure of salient risks</li> <li>Not met: Both requirements under score 1 met</li> </ul>
B.2.3	Integrating and Acting: Integrating assessment findings internally and taking appropriate action	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Not met: Action Plans to mitigate risks: The Company communicate on its supply chain disclosure that it has established compliance and other procedures to mitigate the risks of slavery and human trafficking in its supply chains. However, there is no description of a global system to take action to mitigate salient human rights issues. [Supply Chain Disclosure, June, 2019: <a href="https://www.q4cdn.com">s22.q4cdn.com</a>]</li> <li>Not met: Including in AP supply chain</li> <li>Not met: Example of Actions decided</li> </ul> Score 2 <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	The individual elements of the assessment are met or not as follows: Score 1 <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> Score 2 <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	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Not met: Comms plan re identifying risks</li> <li>Not met: Comms plan re assessing risks</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 AP suppliers</li> </ul> Score 2 <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	1.5	<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: Channel accessible to all workers: The Company explicitly states that if workers have any concern about the Company's Ethical Code and are not comfortable to contact the supervisor, Human Resources or Legal Department, the workers can call Company's confidential hotline. This ethics hotline is also available for external stakeholders. [Code of Business Conduct and Ethics, 01/01/2019: <a href="https://s22.q4cdn.com">s22.q4cdn.com</a> &amp; Supply Chain Disclosure, June, 2019: <a href="https://s22.q4cdn.com">s22.q4cdn.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Number grievances filed, addressed or resolved</li> <li>• Met: Channel is available in all appropriate languages: On the Code of Business Conduct and Ethics there is an annex with 32 country-specific Ethics Hotline numbers that workers can call to raise a complaint. [Code of Business Conduct and Ethics, 01/01/2019: <a href="https://s22.q4cdn.com">s22.q4cdn.com</a>]</li> <li>• Not met: Expect AP supplier to have equivalent grievance systems</li> <li>• Met: Opens own system to AP supplier workers: The Company discloses on its Website that "Company's ethics hotline is also made available for external stakeholders". [Company website, Supply Chain Disclosure, 25/02/2019: <a href="https://capriholdings.com">capriholdings.com</a>]</li> </ul>
C.2	Grievance channel(s)/mechanism(s) to receive complaints or concerns from external individuals and communities	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: Grievance mechanism for community: Capri Holdings discloses in its Supply Chain Disclosure that the Company's ethics hotline is available for external stakeholders. [Supply Chain Disclosure, June, 2019: <a href="https://s22.q4cdn.com">s22.q4cdn.com</a>]</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 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: 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	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: Public statement prohibiting retaliation: In the Code of Business Conduct and Ethics the Company announces that it "prohibits retaliation against any individual who reports, in good faith, any violation of Company policy, including any individual who reports discrimination or harassment or participates in an investigation of any such report". [Code of Business Conduct and Ethics, 01/01/2019: <a href="https://s22.q4cdn.com">s22.q4cdn.com</a> &amp; Supply Chain Disclosure, June, 2019: <a href="https://s22.q4cdn.com">s22.q4cdn.com</a>]</li> <li>• Met: Practical measures to prevent retaliation: The Company despite that all ethics and compliance questions made through the hotline are handled fairly and discreetly. The person who does the complaint does not need to be identified. [Code of Business Conduct and Ethics, 01/01/2019: <a href="https://s22.q4cdn.com">s22.q4cdn.com</a>]</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 AP suppliers to prohibit retaliation</li> </ul>
C.6	Company involvement with State-based judicial and non-	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>

Indicator Code	Indicator name	Score (out of 2)	Explanation
	judicial grievance mechanisms		Score 2 <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	Remediating adverse impacts and incorporating lessons learned	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Describes how remedy has been provided</li> <li>• Not met: Says how it would remedy key sector risks</li> </ul> Score 2 <ul style="list-style-type: none"> <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)

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.2.1.b	Living wage (in the supply chain)	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Met: Living wage in supplier code or contracts: The Company states in its Code of Conduct for Business Partners that the wage and benefit policies must be consistent with prevailing national standards, and also be acceptable under a broader international understanding as to the basic needs of workers and their families. It also states that it will not work with companies whose wage structure violates local law or prevailing industry practice. [Code of Business Conduct and Ethics, 01/01/2019: <a href="https://s22.q4cdn.com">s22.q4cdn.com</a>]</li> <li>• Not met: Improving living wage practices of suppliers</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> <li>• Not met: Provide analysis of trends demonstrating progress</li> </ul>
D.2.2	Aligning purchasing decisions with human rights	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Avoids business model pressure on HRs</li> <li>• Not met: Positive incentives to respect human rights</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> </ul>
D.2.3	Mapping and disclosing the supply chain	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Identifies suppliers back to product source</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Discloses significant parts of supply chain and why</li> </ul>
D.2.4.b	Prohibition on child labour: Age verification and corrective actions (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Child Labour rules in codes or contracts: Despite the Company includes on the contract with business partners that they must not use child labor and not employ workers under the age of 15 or under the legal minimum age for employment, it does not describe that it requires verification of the age of job applicants and workers and remediation programs. [Code of Business Conduct and Ethics, 01/01/2019: <a href="https://s22.q4cdn.com">s22.q4cdn.com</a>]</li> <li>• Not met: How working with suppliers on child labour</li> </ul> Score 2 <ul style="list-style-type: none"> <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	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Met: Debt and fees rules in codes or contracts: The code for partners states that 'Workers must not be required to pay employers' or their agents' recruitment fees or other similar fees (such as host country fees levies, fees for work permit, or fees for renewing work documents, or home country fees like visa fees, medical checks, or any other costs that are not the legal responsibility for workers)'. [Supply Chain Disclosure, June, 2019: <a href="https://s22.q4cdn.com">s22.q4cdn.com</a>]</li> <li>• Not met: How working with suppliers on debt &amp; fees</li> </ul> Score 2 <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>

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	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Met: Free movement rules in codes or contracts: The Code for business partners requires that "workers must not be subject to the withholding of wages, original identification cards, original passports or other original travel documents or personal belongings". [Code of Conduct for Business Partners, 01/01/2019: <a href="https://s22.q4cdn.com">s22.q4cdn.com</a>]</li> <li>Not met: How these practices are implemented and monitored for agencies, labour brokers or recruiters</li> </ul> Score 2 <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	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Not met: FoA &amp; CB rules in codes or contracts: The Company describes in the Code of Conduct for Business Partners that "business partners should respect the legal rights of employees to freely and without harassment participate in worker organizations of their choice". However, there is no mention to respect the right of collective bargaining. [Code of Business Conduct and Ethics, 01/01/2019: <a href="https://s22.q4cdn.com">s22.q4cdn.com</a>]</li> <li>Not met: How working with suppliers on FoA and CB</li> </ul> Score 2 <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	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Not met: Sets out clear Health and Safety requirements: The Company states in its Code of Conduct Business Partners that the supply chain "must ensure that their workers are provided a safe and healthy work environment, and are not subject to unsanitary or hazardous conditions". However, there no further details found on health and safety requirements. [Code of Business Conduct and Ethics, 01/01/2019: <a href="https://s22.q4cdn.com">s22.q4cdn.com</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> Score 2 <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	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Not met: Women's rights in codes or contracts</li> <li>Not met: How working with suppliers on women's rights</li> </ul> Score 2 <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>
D.2.9.b	Working hours (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Not met: Working hours in codes or contracts: The Company states on its Supplier Code that "suppliers must comply with all laws regulating local wages, work hours and benefits". However, there is no description about the maximum working hours that suppliers must work and rest periods. [Code of Business Conduct and Ethics, 01/01/2019: <a href="https://s22.q4cdn.com">s22.q4cdn.com</a>]</li> <li>Not met: How working with suppliers on working hours</li> </ul> Score 2 <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		<ul style="list-style-type: none"> <li>• <b>Headline:</b> Apex Tannery and Bay Tanneries linked to child labor, safety hazards, and other violations</li> <li>• <b>Area:</b> Child labour</li> <li>• <b>Story:</b> A report by Transparentem alleges children as young as 14 are made to work at the Apex and Bay Tanneries in Bangladesh, both of which supply leather that has been traced to luxury brand labels including Michael Kors. Transparentem didn't say that the leather from the tanneries ends up in the products of American or European companies, only that the manufacturers of some of those goods receive the leather. The allegations focus on the Hazaribagh neighbourhood, a hub of Bangladesh's leather industry which has over 150 tanneries. The report claims to show video footage from 2015 of a mother confirming her 14 year old son was working in one of the tanneries, footage from 2016 then shows the same child still working there. In another video a 17 year old boy confirms his age to the videographer, two other workers agree that there are also a number of 15 year old children who are working on site. The organisation doesn't publish any of the footage or its findings to protect investigators whose work is still ongoing. Using customs records and business documents, they found those factories make shoes and purses for Clarks, Coach, Kate Spade, Macy's, Michael Kors, Sears, Steven Madden and Timberland. The organisation said that no one followed a piece of leather produced by a child to a particular purse or shoe. The managing director of Apex Footwear said report was a 'smear campaign' whose claims of child labour were 'baseless'. Bay Footwear's technical advisor also disputed the claims of child workers in the their operations, calling the findings 'absolutely baseless'. The sales director at White Industry Co., said the South Korean company stopped using raw materials from Bangladesh late last year after U.S. clients such as Coach, Michael Kors and Kate Spade informed them about environmental problems and child labor issues. Now they use American, Brazilian and Pakistani suppliers.</li> <li>• <b>Sources:</b> [Associated Press - 25/03/2017: <a href="http://apnews.com">apnews.com</a>][PBS News - 29/03/2017: <a href="http://pbs.org">pbs.org</a>]</li> </ul>
E(1).1	The Company has responded publicly to the allegation	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>• <b>Met:</b> Public response available: The company provides a brief response to allegations it sourced leather from tanneries using child labour, claiming that they were a few steps removed from the Hazaribagh tanneries, hadn't knowingly sourced leather there, and would make sure not to. [Associate Press article, 25/03/2017: <a href="http://apnews.com">apnews.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• <b>Not met:</b> Response goes into detail: The response doesn't provide sufficient detail.</li> </ul>
E(1).2	The Company has appropriate policies in place	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>• <b>Met:</b> Company policies address the general issues raised: The company in its 'Code of Conduct for Business Partners' says "Our business partners must not use child labor, defined as school-age children. Our business partners will not employ workers under the age of 15 or under the legal minimum age for employment in the applicable country, whichever is greatest. This provision extends to all partner facilities. In addition, workers under the age of 18 should not be exposed to hazardous working conditions." [Code of Conduct for Business Partners, 01/01/2019: <a href="http://s22.q4cdn.com">s22.q4cdn.com</a>]</li> <li>• <b>Met:</b> Policies apply to the type of business relationships involved: On its 'Supply Chain Disclosure' page the company says "We also have a Code of Conduct that is applicable to all of the Company's suppliers (including our third-party manufacturers and product licensees)". Regarding the risks of slave labour in its supply chain, the company says "Our approach is to focus on our direct (tier 1) suppliers, since this is the level of the supply chain where we believe that we have the most influence and can therefore be the most effective." [Supply Chain Disclosure, 2018: <a href="http://s22.q4cdn.com">s22.q4cdn.com</a> &amp; Code of Conduct for Business Partners, 01/01/2019: <a href="http://s22.q4cdn.com">s22.q4cdn.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• <b>Not met:</b> Policies address the specific rights in question: The company says it has an Audit program where third party manufacturers and manufacturers are subjected to announced audits at least every 3 years, which cover issues including "a manufacturer's compliance with wage, hour and labor laws and health, safety and environmental regulations, as well as the working and other conditions within the facility". However there is no specific mention of ensuring the manufacturers</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			have an age verification process as part of their agreement with Capri Holdings. This is not sufficient. [Supply Chain Disclosure, 2018: <a href="https://www.s22.q4cdn.com">s22.q4cdn.com</a> ]
E(1).3	The Company has taken appropriate action	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 with affected stakeholders: The company has not provided any evidence or indication it has engaged with affected stakeholders, instead the company claims "they were a few steps removed from the Hazaribagh tanneries, hadn't knowingly sourced leather there, and would make sure not to." [Associate Press article, 25/03/2017: <a href="https://www.apnews.com">apnews.com</a>]</li> <li>• Not met: Encourages linked business to engage affected stakeholders: The company claims "they were a few steps removed from the Hazaribagh tanneries, hadn't knowingly sourced leather there, and would make sure not to." however it does not provide any evidence of engaging its linked suppliers and manufacturers to ensure that they didn't source leather from those tanneries. [Associate Press article, 25/03/2017: <a href="https://www.apnews.com">apnews.com</a>]</li> <li>• Not met: Provides remedies to affected stakeholders: The company, whilst claiming not to have knowingly sources leather from the affected tanneries, has not provided evidence of offering any form of remedy to the affected stakeholders.</li> <li>• Not met: Has reviewed management systems to prevent recurrence: The company states simply that it "hadn't knowingly sourced leather from the affected tanneries and would make sure not to". However this doesn't provide any evidence of a review being conducted into the company's management systems to prevent recurrence. [Associate Press article, 25/03/2017: <a href="https://www.apnews.com">apnews.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Remedies are satisfactory to the victims: The company has not provided any evidence of remedy being given to the children working in the tanneries.</li> <li>• Not met: Has improved systems and engaged affected stakeholders: The company has not provided any evidence it has improved its systems since the allegations we made, it simply says that it would make sure not to source leather from the affected tanneries in the future. [Associate Press article, 25/03/2017: <a href="https://www.apnews.com">apnews.com</a>]</li> </ul>

## F. Transparency (10% of Total)

Indicator Code	Indicator name	Score	Explanation
F.1	Company willingness to publish information	0.9 out of 4	Out of a total of 40 indicators assessed under sections A-D of the benchmark, Capri Holdings made data public that met one or more elements of the methodology in 9 cases, leading to a disclosure score of 0.9 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>Capri Holdings met 0 of the 8 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> </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.

The Benchmark is made available on the express understanding that it will be used solely for general information purposes. The material contained in the Benchmark should not be construed as relating to accounting, legal, regulatory, tax, research or investment advice and it is not intended to take into account any specific or general investment objectives. The material contained in the Benchmark does not constitute a recommendation to take any action or to buy or sell or otherwise deal with anything or anyone identified or contemplated in the Benchmark. Before acting on anything contained in this material, you should consider whether it is suitable to your particular circumstances and, if necessary, seek professional advice. The material in the Benchmark has been put together solely according to the CHRB methodology and not any other assessment models in operation within any of the project partners or EIRIS Foundation as provider of the analyst team.

No representation or warranty is given that the material in the Benchmark is accurate, complete or up-to-date. The material in the Benchmark is based on information that we consider correct and any statements, opinions, conclusions or recommendations contained therein are honestly and reasonably held or made at the time of publication. Any opinions expressed are our current opinions as of the date of the publication of the Benchmark only and may change without notice. Any views expressed in the Benchmark only represent the views of CHRB Ltd, unless otherwise expressly noted.

While the material contained in the Benchmark has been prepared in good faith, neither CHRB Ltd nor any of its agents, representatives, advisers, affiliates, directors, officers or employees accept any responsibility for or make any representation or warranty (either express or implied) as to the truth, accuracy, reliability or completeness of the information contained in this Benchmark or any other information made available in connection with the Benchmark. Neither CHRB Ltd nor any of its agents, representatives, advisers, affiliates, directors, officers and employees undertake any obligation to provide the users of the Benchmark with additional information or to update the information contained therein or to correct any inaccuracies which may become apparent (save as to the extent set out in CHRB Ltd's appeals procedure). To the maximum extent permitted by law any responsibility or liability for the Benchmark or any related material is expressly disclaimed provided that nothing in this disclaimer shall exclude any liability for, or any remedy in respect of, fraud or fraudulent misrepresentation. Any disputes, claims or proceedings this in connection with or arising in relation to this Benchmark will be governed by and construed in accordance with English law and submitted to the exclusive jurisdiction of the courts of England and Wales.

As CHRB Ltd, we want to emphasise that the results will always be a proxy for good human rights management, and not an absolute measure of performance. This is because there are no fundamental units of measurement for human rights. Human rights assessments are therefore necessarily more subjective than objective. The Benchmark also captures only a snap shot in time. We therefore want to encourage companies, investors, civil society and governments to look at the broad performance bands that companies are ranked within rather than their precise score because, as with all measurements, there is a reasonably wide margin of error possible in interpretation. We also want to encourage a greater analytical focus on how scores improve over time rather than upon how a company compares to other companies in the same industry today. The spirit of the exercise is to promote continual improvement via an open assessment process and a common understanding of the importance of the UN Guiding Principles on Business and Human Rights.