

## Corporate Human Rights Benchmark 2018 Company Scoresheet



**Company Name** Carrefour  
**Industry** Agricultural Products (Supply Chain only)  
**Overall Score (\*)** 25.1 out of 100

Theme Score	Out of	For Theme
6.0	10	A. Governance and Policies
9.1	25	B. Embedding Respect and Human Rights Due Diligence
1.7	15	C. Remedies and Grievance Mechanisms
1.5	20	D. Performance: Company Human Rights Practices
2.5	20	E. Performance: Responses to Serious Allegations
4.4	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 2018 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	2	The individual elements of the assessment are met or not as follows: Score 1 • Met: General HRs commitment: Carrefour's Code of Business Conduct states that 'our guiding principles and conduct are also in keeping with the Carrefour Group's continued commitment to the respect and promotion of fundamental principles, notably: the Universal Declaration of Human Rights; the International Labour Organization Conventions, in particular those concerning the prohibition of child labour and forced labour; the OECD guiding principles, in particular the fight against corruption; the ten principles of the UN Global Compact; the International Agreement of May 2001 with the UNI (Union Network International).' [CARREFOUR CODE OF BUSINESSCONDUCT: <a href="http://filcams.it">filcams.it</a> ] • Met: UDHR: See above [CARREFOUR CODE OF BUSINESSCONDUCT: <a href="http://filcams.it">filcams.it</a> ] Score 2 • Met: OECD: See above [CARREFOUR CODE OF BUSINESSCONDUCT: <a href="http://filcams.it">filcams.it</a> ]
A.1.2	Commitment to respect the human rights of workers	2	The individual elements of the assessment are met or not as follows: Score 1 • Met: ILO Core: Carrefour commits to the ten principles of the UN Global Compact, and the health and safety of its employees. The Company's Code of Business Conduct and Social Charter for suppliers include all ILO core labour standards (including health & safety commitments). Carrefour has also stated that 'suppliers also have the responsibility to ensure these commitments are respected by all its subcontractors'. [CARREFOUR CODE OF BUSINESSCONDUCT: <a href="http://filcams.it">filcams.it</a> ] • Met: UNGC principles 3-6: see above

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Met: All four ILO for AG suppliers: see above</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Met: All four ILO Core: see above</li> <li>• Met: Respect H&amp;S of workers: see above</li> <li>• Met: H&amp;S applies to AG suppliers: see above</li> </ul>
A.1.3.a.AG	Commitment to respect human rights particularly relevant to the industry - land and natural resources (AG)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Respect land ownership and resources</li> <li>• Not met: Respecting the right to water</li> <li>• Not met: Expecting suppliers to respect these rights</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Voluntary Guidelines on Tenure</li> <li>• Not met: IFC Performance Standards</li> <li>• Not met: FPIC for all</li> <li>• Not met: Zero tolerance for land grabs</li> <li>• Not met: Respecting the right to water</li> <li>• Not met: Expecting suppliers to respect these rights</li> </ul>
A.1.3.b.AG	Commitment to respect human rights particularly relevant to the industry - people's rights (AG)	1.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Met: Women's rights: In its annual report 2016, it explains that Carrefour is committed to Women's Empowerment Principles and to SDG on gender equality [carrefour- 2016 annual activity and responsible commitment report, 2016: <a href="http://carrefour.com">carrefour.com</a>]</li> <li>• Met: Expects suppliers to respect these rights: The commitment to WEP includes suppliers according to the CHRB research manual [carrefour- 2016 annual activity and responsible commitment report, 2016: <a href="http://carrefour.com">carrefour.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Met: CEDAW/Women's Empowerment Principles: The company is committed to WEP [carrefour- 2016 annual activity and responsible commitment report, 2016: <a href="http://carrefour.com">carrefour.com</a>]</li> <li>• Not met: Expecting suppliers to respect these rights</li> </ul>
A.1.4	Commitment to engage with stakeholders	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Met: Commits to stakeholder engagement: In the Carrefour solidarity leaflet, it explains its engagement with local communities and other communities. "Carrefour engages in outreach projects with the support of its stores rooted in the local community by relying on non-profit organisations that work directly with people in need." [Carrefour solidarity - overview, 2014: <a href="http://carrefour.com">carrefour.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Commits to engage stakeholders in design: The Company indicates that as part of its duty care plan, stakeholders are involved in the process of risk identification and that in corrective and mitigation actions it will seek to implement a collaborative approach between brands and stakeholders. However, no evidence found of a commitment to engage with affected stakeholders and legitimate representatives in the development or monitoring of the human rights approach. [Registration document 2017, 2018: <a href="http://carrefour.com">carrefour.com</a>]</li> <li>• Not met: Regular stakeholder design engagement</li> </ul>
A.1.5	Commitment to remedy	0	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 remedy</li> </ul> Score 2 <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</li> </ul>
A.1.6	Commitment to respect the rights of human rights defenders	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Zero tolerance attacks on HRs Defenders (HRDs)</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Expects AG 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	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Met: CEO or Board approves policy: The code of business which explains the commitment to HR is introduced by the CEO [CARREFOUR CODE OF BUSINESSCONDUCT: <a href="http://filcams.it">filcams.it</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Met: Board level responsibility for HRs: There is a board committee responsible for CSR which includes HR (the committee assess specific issues like HRs compliance by its suppliers) [Registration Document Annual Financial Report 2016, 2016: <a href="http://carrefour.com">carrefour.com</a>] Score 2</li> <li>• Not met: Speeches/letters by Board members or CEO</li> </ul>
A.2.2	Board discussions	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: Board/Committee review of salient HRs: In its annual report there is a description of the CSR Board committee meetings and the discussion on the social elements of the CSR policy. This along with the 2015 annual report which specifically address HRs issues qualify to meet this indicator [Registration Document Annual Financial Report 2016, 2016: <a href="http://carrefour.com">carrefour.com</a>]</li> <li>• Not met: Examples or trends re HR discussion: The Company indicates that the CSR committee reviewed the results of the risk prevention plan associated with working conditions in the non-food supply chain. However, no further details found about discussion. [Registration document 2017, 2018: <a href="http://carrefour.com">carrefour.com</a>] Score 2</li> <li>• Not met: Both examples and process</li> </ul>
A.2.3	Incentives and performance management	2	<p>The individual elements of the assessment are met or not as follows: Score 1</p> <ul style="list-style-type: none"> <li>• Met: Incentives for at least one board member: The Compensation for the Chairman and CEO has 35% of its compensation structure based on variable compensation. From this 35%, 20% is based in CSR (non-financial objectives). These CSR objectives include to implement CSR self-evaluation process for suppliers (based in ISO 26000, which includes working practices and human rights), women to account for at least 40% of appointments to key positions within the Group by 2025, each country to obtain GEEIS certification by 2020 and all countries to implement an action plan on health, safety and quality of life in the workplace by 2020. [Registration document 2017, 2018: <a href="http://carrefour.com">carrefour.com</a>]</li> <li>• Met: At least one key AG HR risk, beyond employee H&amp;S: CSR objectives include % of women appointed to key positions within the group, implement action plans on health, safety and quality of life in the workplace, and to complete the implementation of the CSR self-evaluation process for suppliers (the Company indicates that this self-evaluation is based in ISO 26000) [Registration document 2017, 2018: <a href="http://carrefour.com">carrefour.com</a>] Score 2</li> <li>• Met: Performance criteria made public: All the information mentioned above about components of CSR and % of remuneration allocated is disclosed in the Company's registration document (annual report).</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: Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Senior responsibility fo HR (inc ILO): The website (and the registration document) explains the structure of the CSR governance, it does not refers to HR or to related issues - the focus is on environment more than HR : "At Group level, the CSR department, which reports directly to Carrefour's Chief Operating Officer – the Group's General Corporate Secretary – ensures that the CSR methodology is implemented. His role involves defining the Group's social responsibility strategy, managing its implementation, initiating projects and dealing with matters at the highest level of the company, as well as ensuring that the agreed strategies are adopted and best practices are disseminated internally." However, it is not clear in the public sources whether Human rights are allocated within this structure. The Company has provided information, but no evidence found in the public domain. [CSR governance, 9 May 2018: <a href="http://carrefour.com">carrefour.com</a> &amp; Registration document 2017, 2018: <a href="http://carrefour.com">carrefour.com</a>] Score 2</li> <li>• Not met: Day-to-day responsibility: As above. However, no evidence found in public sources of the CSR responsibility allocation including human rights, or these being allocated elsewhere. [CSR governance, 9 May 2018: <a href="http://carrefour.com">carrefour.com</a> &amp; Registration document 2017, 2018: <a href="http://carrefour.com">carrefour.com</a>]</li> <li>• Not met: Day-to-day responsibility in supply chain</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
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> </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 part of enterprise risk system: In the annual report the company explains that it has revised its risk system following a review of the CSR risk "in 2014 and 2016, Carrefour hired a third-party expert to update its risk mapping and risk materiality assessment to revise its risk strategy and its management in view of CSR risks and opportunities and stakeholder expectations". This along with the evidence from the 2015 annual report which specifically mentions HR, meet the indicator [Registration Document Annual Financial Report 2016, 2016: <a href="http://carrefour.com">carrefour.com</a>]</li> </ul> Score 2 <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	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Communicates its policy to all workers in own operations: The Company indicates that 'all employees are given a copy of the Ethics Principles'. It also states that these principles are 'signed by all employees'. The document contains a commitment to the ILO declaration. However, it is not clear whether it has been communicated in local languages (where relevant). [Registration document 2017, 2018: <a href="http://carrefour.com">carrefour.com</a>]</li> </ul> Score 2 <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	2	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Met: Steps to communicate policy commitments to BRs: The committee responsible for implementing their HR policy is also responsible for "raising awareness among suppliers and sourcing teams and providing them with training;" [carrefour- 2016 annual activity and responsible commitment report, 2016: <a href="http://carrefour.com">carrefour.com</a>]</li> <li>• Met: Including to AG suppliers: The committee responsible for implementing their HR policy is also responsible for "raising awareness among suppliers and sourcing teams and providing them with training". In the supplier charter, it says: "The supplier also has the responsibility to ensure these commitments are respected by all its subcontractors."</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Met: How HR commitments made binding/contractual: In the supplier charter, it is clear that the human rights standards are obligatory for the suppliers and are part of the contract [Social and Ethical charter for suppliers: <a href="http://carrefour.com">carrefour.com</a>]</li> <li>• Met: Including on AG suppliers: In the supplier charter, it says: 'Carrefour also expects its suppliers to take measures to inform and raise awareness, and implement reference frameworks on ethics and integrity, in relation to their own suppliers, providers, and subcontractors. [Social and Ethical charter for suppliers: <a href="http://carrefour.com">carrefour.com</a>]</li> </ul>
B.1.5	Training on Human Rights	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Trains all workers on HR policy commitments</li> <li>• Met: Trains relevant managers including procurement: The sourcing team is trained - "The committee responsible for implementing their HR policy is also responsible for "raising awareness ... sourcing teams and providing them with training;" [Registration Document Annual Financial Report 2016, 2016: <a href="http://carrefour.com">carrefour.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> </ul>
B.1.6	Monitoring and corrective actions	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Met: Monitoring implementation of HR policy commitments: In the video on this page, it describes the CSR monitoring which includes diversity/gender equality, health and safety and "working conditions". It could be inferred that working conditions qualify as HR [video of implementation, 9 May 2018: <a href="http://carrefour.com">carrefour.com</a>]</li> <li>• Met: Monitoring AG suppliers: Suppliers are monitored and audited by FIDH and Carrefour assist suppliers with the audits - "helping suppliers to achieve compliance</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>in partnership with the International Federation for Human Rights (Fédération Internationale des ligues des droits de l'homme – FIDH),". This indicates that there is audits and monitoring. [carrefour- 2016 annual activity and responsible commitment report, 2016: <a href="http://carrefour.com">carrefour.com</a>]</p> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Describes corrective action process: The Company indicates that independent audits and inspections of supplier premises give rise to action plans designed to remedy any violations observed. 'The supplier is required to implement each corrective action in the plan before a specified deadline. Compliance with the action plan and implementation deadline is monitored through follow-up audits. If a supplier audit report contains a critical non-compliance issue (child, forced labour, safety conditions, etc.), Carrefour will be informed within 48 hours. Training or specific support may be provided to suppliers where warranted by the non-compliance issues. On its website, in the context of non-food supply chain additional details are provided on the deadlines of the corrective action plans. Finally, also on its website, the Company indicates that in 2016 it carried out 1,344 supplier audits, including 547 listing audits. 23% of these results resulted in warning being used (which activates corrective action plans). Main warning where related with safety non-compliance (43%), failure to adhere to working hours (20%) and failure to pay overtime or the minimum wage (18%). However, these figures are disclosed in the context of non-food supply chains (not agricultural products), and therefore it is not clear whether these were all the times that the corrective action procedure was activated. [Providing support to our partners on website, 07/2018: <a href="http://carrefour.com">carrefour.com</a> &amp; Registration document 2017, 2018: <a href="http://carrefour.com">carrefour.com</a>]</li> <li>• Not met: Example of corrective action</li> <li>• Not met: Discloses % of 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 selection of suppliers: In the suppliers code, it states that "Any supplier that does not comply with these principles risks being held liable and harm the image of its company...they would also harm their chances of being selected as part of the call for tenders and their commercial relations with Carrefour could stop. [CARREFOUR CODE OF BUSINESSCONDUCT: <a href="http://filcams.it">filcams.it</a>]</li> <li>• Met: HR affects on-going supplier relationships: In the suppliers code, it states that "Any supplier that does not comply with these principles risks being held liable and harm the image of its company...they would also harm their chances of being selected as part of the call for tenders and their commercial relations with Carrefour could stop.</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Both requirement under score 1 met [CARREFOUR CODE OF BUSINESSCONDUCT: <a href="http://filcams.it">filcams.it</a>]</li> <li>• Not met: Working with suppliers to improve performance: The supplier code states: "Carrefour further commits to accompany its suppliers, to the extent possible, in the implementation of those social principles, especially during the implementation of corrective action plans." In the context of risk prevention and support, the Company provides self-assessment tools to 'embark in the CSR approach'. The Registration document states that 'Carrefour develops training and awareness tools for its suppliers in partnership with consultants or local NGOs. For example, the "Good Factory Standard" is a practical training manual which is broken down by sector and/or product type and contains photographs to ensure that all factory workers can understand it, regardless of their geographical location or level of education. Training courses are also given in specific subjects based on the potential risks identified in a country, area or activity'. However, it is not clear whether this example of standard includes human rights issues. The Company also provides additional evidence of working with suppliers in improving, but in the context of corrective action plans. [CARREFOUR CODE OF BUSINESSCONDUCT: <a href="http://filcams.it">filcams.it</a>]</li> </ul>
B.1.8	Approach to engagement with potentially affected stakeholders	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: Stakeholder process or systems: Although the Company has a clear system to engage with employees through the framework agreement, it is not clear how it has identified and engaged with affected stakeholders in the last two years beyond this case (for instance, with workers or local communities in its supply chain). [Registration document 2017, 2018: <a href="http://carrefour.com">carrefour.com</a>]</li> <li>• Met: Frequency and triggers for engagement: In the context of employee relations the Company signed a framework agreement with UNI Global Union, and</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>as part of the agreement, social dialogue is implemented 'in all Group countries and entities. Discussions and consultation with employee or trade union representatives can be organised and coordinated at local, national or transnational level, depending on locally-identified needs'. [Registration document 2017, 2018: <a href="http://carrefour.com">carrefour.com</a>]</p> <ul style="list-style-type: none"> <li>• Not met: Workers in SC engaged</li> <li>• Not met: Communities in the SC engaged</li> </ul> <p>Score 2</p> <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	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: Identifying risks in own operations: As part of implementation of the duty care plan following new French Law, the Company explains the process it is following to identify and assess its risks including human rights risks. It has three steps: The first consists in identifying as possible all the risks to which Carrefour exposes the environment and its stakeholders. This step involves consulting internal and external stakeholders in the process of identifying and reviewing the key risks according to their areas of expertise. Stakeholders include relevant operational staff and partner NGOs and trade Unions. It uses compliance risk databases to identify compliance issues (mainly ILO's). Following this, the Company has identified risks related to business process, business sector and geography. [Registration document 2017, 2018: <a href="http://carrefour.com">carrefour.com</a>]</li> <li>• Met: Identifying risks in AG suppliers: Risk mapping and assessment process includes both business operations and supply chain. [Registration document 2017, 2018: <a href="http://carrefour.com">carrefour.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Ongoing global risk identification: The Company has made the risk mapping during the last year. In addition, it states that 'the risk mapping process will be monitored continuously and updated annually, mainly through existing partnerships'. [Registration document 2017, 2018: <a href="http://carrefour.com">carrefour.com</a>]</li> <li>• Met: In consultation with stakeholders: The first step of the process consists in stakeholder consultation. [Registration document 2017, 2018: <a href="http://carrefour.com">carrefour.com</a>]</li> <li>• Met: In consultation with HR experts: The Company indicates that 'in the risk analysis, Carrefour not only consults its own staff but also draws on the expertise of its partners, FIDH (International Federation for Human Rights), WWF and the trade unions, to identify risk situations. [Registration document 2017, 2018: <a href="http://carrefour.com">carrefour.com</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)	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: Salient risk assessment (and context): The risk mapping process started with the identification of all the risks to which Carrefour is exposed with help of stakeholders. The second consists in assessing those risks with regard to the probability of occurrence and the severity of potential impacts. The risk is then rated based on a combination of its importance and frequency. It has identified risks related to business activities, to business sectors (particularly as part of supplier and service provider relationships), and risks related to countries in which it operates or sources certain products. The combination of risk type is supplemented by cross-referencing with other information sources, including updated lists of human rights violations by companies operating in the same or comparable sectors, and consultations with NGOs involved in human rights issues. [Registration document 2017, 2018: <a href="http://carrefour.com">carrefour.com</a>]</li> <li>• Not met: Public disclosure of salient risks</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> </ul>
B.2.3	Integrating and Acting: Integrating assessment findings internally and taking	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: Action Plans to mitigate risks: The Company describes its framework and measures to prevent violations, including ethical principles, social and environmental charters and policies, social dialogue with unions, and supplier assessments. However, it is not clear if it has a system to prevent, mitigate or remediate specific actual human rights salient issues identified and assessed following the process. [Registration document 2017, 2018: <a href="http://carrefour.com">carrefour.com</a>]</li> <li>• Not met: Example of Actions decided</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
	appropriate action		<ul style="list-style-type: none"> <li>• Not met: Including in AG supply chain</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: The Company describes the corrective action process when monitoring compliance with policies. However no evidence found of a system that tracks actions taken in a broad sense to tackle human rights impacts considered as salient and evaluates their effectiveness. Despite no evidence found of a system, the Company indicates that following the 'Fire and Building Safety agreement' all operational factories working for Carrefour were inspected and 87% of improvement actions recommended had been implemented. [Providing support to our partners on website, 07/2018: <a href="http://carrefour.com">carrefour.com</a> &amp; Registration document 2017, 2018: <a href="http://carrefour.com">carrefour.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <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	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Met: Comms plan re identifying risks: The Company has communicated through its Annual report the process it has followed to identify its human rights risks, including an ongoing process in collaboration with stakeholders and human rights experts. [Registration document 2017, 2018: <a href="http://carrefour.com">carrefour.com</a>]</li> <li>• Not met: Comms plan re assessing risks: Although the Company has explained in its Annual report the process it follows to identify and assess human rights issues, no evidence found of the Company communicating which are its salient human rights issues. [Registration document 2017, 2018: <a href="http://carrefour.com">carrefour.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <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> </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	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Met: Channel accessible to all workers: The Company's ethical principles include detailed information in relation to how to issue an alert, including line managers, country's alert system, ethics alert line (website, etc.). The Company states that 'any employee may report any practice or action that they believe to be contrary to or incompatible with the stated principles'. [Ethical Principles: <a href="http://carrefour.com">carrefour.com</a>]</li> </ul> Score 2 <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: The Company indicates that 'The special ethics alert line, available 24 hours a day, 7 days a week in all of the Group's languages'. It is available to all employees and includes website and phone lines. [Ethical Principles: <a href="http://carrefour.com">carrefour.com</a>]</li> <li>• Met: Opens own system to AG supplier workers: As indicated in the FAQ's section of the alert line website, the Company's ethics line is open for suppliers and service providers to raise concerns. [Ethics alert line: <a href="http://ethique.carrefour.com">ethique.carrefour.com</a>]</li> </ul>
C.2	Grievance channel(s)/mechanism(s) to receive complaints or concerns from external individuals and communities	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Grievance mechanism for community: The ethics line is open to employees, suppliers and service providers. No evidence found in relation to any stakeholder, including communities, being allowed to report concerns. [Ethics alert line: <a href="http://ethique.carrefour.com">ethique.carrefour.com</a> &amp; Ethical Principles: <a href="http://carrefour.com">carrefour.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Describes accessibility and local languages: The ethics line is available on its website in 11 different languages. However, as mentioned above, no evidence found of this line being open to other external stakeholders including communities.</li> <li>• Not met: Expects AG supplier to have community grievance systems</li> <li>• Not met: AG supplier communities use global system</li> </ul>
C.3	Users are involved in the	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Engages users to create or assess system</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
	design and performance of the channel(s)/mechanism(s)		<ul style="list-style-type: none"> <li>• Not met: Description of how they do this</li> </ul> Score 2 <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> </ul>
C.4	Procedures related to the mechanism(s)/channel(s) are publicly available and explained	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Response timescales: The FAQs section of the ethics line (operated by a third party) states that a notification is sent to the relevant Carrefour Ethics and Compliance team member for review. [Ethics alert line: <a href="http://ethique.carrefour.com">ethique.carrefour.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: How complainants will be informed</li> <li>• Not met: Escalation to senior/independent level</li> </ul>
C.5	Commitment to non-retaliation over complaints or concerns made	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Met: Public statement prohibiting retaliation: The Company indicates in its 'ethical principles' document, which goes together with the procedure to issue an alert that 'no sanctions may be taken against employees who report - in good faith- any failures to comply with these principles'. [Ethical Principles: <a href="http://carrefour.com">carrefour.com</a>]</li> <li>• Not met: Practical measures to prevent retaliation: Although the Company guarantees confidentiality, no evidence found of measures to prevent sanctions/retaliation. [Ethical Principles: <a href="http://carrefour.com">carrefour.com</a>]</li> </ul> Score 2 <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> </ul>
C.6	Company involvement with State-based judicial and non-judicial grievance mechanisms	0	The individual elements of the assessment are met or not as follows: Score 1 <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> 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	Remedying 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.1.1.b	Living wage (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: Living wage in supplier code or contracts: Suppliers' commitments contained in the charter include the following: give employees remuneration which satisfies their basic needs and those of the members of their family who are directly dependent on them'. However, in order to consider living wage it should contain also some commitment to discretionary income. [Social and Ethical charter for suppliers: <a href="http://carrefour.com">carrefour.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: Provides analysis of trends in progress made</li> </ul>
D.1.2	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 (purchasing practices): In its supplier code, the company states "Conscious that the respect of these commitments can only be fully realized through a collaborative relationship with its suppliers, Carrefour commits not to impose conditions on its suppliers that would prevent them from implementing these commitments". However, no further details found. [Social and Ethical charter for suppliers: <a href="http://carrefour.com">carrefour.com</a>]</li> <li>• Not met: Positive incentives to respect human rights (purchasing practices)</li> </ul>



Indicator Code	Indicator name	Score (out of 2)	Explanation
			Score 2 • Not met: Both requirements under score 1 met
D.1.3	Mapping and disclosing the supply chain	0	The individual elements of the assessment are met or not as follows: Score 1 • Not met: Identifies suppliers back to manufacturing sites (factories or fields) Score 2 • Not met: Discloses significant parts of SP and why
D.1.4.b	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 • Not met: Child Labour rules in codes or contracts: The company does Prohibits " child Labour: not to employ children under the age 15". No evidence found of guidelines on age verification or remediation programmes in its agreements or supplier code. [Social and Ethical charter for suppliers: <a href="http://carrefour.com">carrefour.com</a> ] • Not met: How working with suppliers on child labour Score 2 • Not met: Both requirements under score 1 met • Not met: Analysis of trends in progress made
D.1.5.b	Forced labour: Debt bondage and other unacceptable financial costs (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 • Not met: Debt and fees rules in codes or contracts: The company states in the supplier code: "Prohibition of forced, bonded, indentured and prison Labour: All work must be done on a voluntary basis and any kind of threat, penalty or sanction must be eradicated". However, no evidence found in relation to guidelines on debt bondage, including imposing financial burdens on workers by withholding wages or expenses including recruitment fees. The Company indicates that as a member of the Consumer Goods Forum it has 'helped to establish a set of principles aimed at reducing forced labour, which have become part of the Group practices'. However, it is not clear how this has translated into supplier requirements or practices. [Social and Ethical charter for suppliers: <a href="http://carrefour.com">carrefour.com</a> & Registration document 2017, 2018: <a href="http://carrefour.com">carrefour.com</a> ] • Not met: How working with suppliers on debt & fees Score 2 • Not met: Both requirements under score 1 met • Not met: Analysis of trends in progress made
D.1.5.d	Forced labour: Restrictions on workers (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 • Not met: Free movement rules in codes or contracts: The company states in the supplier code: "Prohibition of forced, bonded, indentured and prison Labour: All work must be done on a voluntary basis and any kind of threat, penalty or sanction must be eradicated". However, no evidence found in relation to guidelines on freedom of movement, including refraining from passport retention or other documents. The Company indicates that as a member of the Consumer Goods Forum it has 'helped to establish a set of principles aimed at reducing forced labour, which have become part of the Group practices'. However, it is not clear how this has translated into supplier requirements or practices. [Social and Ethical charter for suppliers: <a href="http://carrefour.com">carrefour.com</a> & Registration document 2017, 2018: <a href="http://carrefour.com">carrefour.com</a> ] • Not met: How working with suppliers on free movement Score 2 • Not met: Both requirements under score 1 met • Not met: Analysis of trends in progress made
D.1.6.b	Freedom of association and collective bargaining (in the supply chain)	1	The individual elements of the assessment are met or not as follows: Score 1 • Met: FoA & CB rules in codes or contracts: Though the company states in its supplier code: "Respect for freedom of association and effective recognition of the right to collective bargaining: to ensure workers have the right to organise themselves freely into unions and be represented by organisations of their choice so as to carry out collective bargaining" it does not make reference to intimidation against trade unionists. The Company also has a statement on non-discrimination that includes 'prohibition of discrimination, harassment and physical abuse', including 'belonging to a union'. [Social and Ethical charter for suppliers: <a href="http://carrefour.com">carrefour.com</a> ] • Not met: How working with suppliers on FoA and CB Score 2 • Not met: Both requirements under score 1 met • Not met: Provides analysis of trends in progress made

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.1.7.b	Health and safety: Fatalities, lost days, injury rates (in the supply chain)	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Met: Sets out clear Health and Safety requirements: Stated in the Supplier Code: "Carrefour expects its suppliers to take all measures necessary to guarantee a safe and healthy work environment for its employees, while adhering to local and international regulations and through the implementation of best professional practices." Also, suppliers have "to guarantee that all the corresponding provisions are defined to cater for specific conditions and related hazards pertaining to their specific industries, in accordance with the relevant applicable principles". [Social and Ethical charter for suppliers: <a href="http://carrefour.com">carrefour.com</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> 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.1.8.b	Land rights: Land acquisition (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: Rules on land &amp; owners in codes or contracts</li> <li>Not met: How working with suppliers on land issues</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Not met: Both requirements under score 1 met</li> <li>Not met: Provides analysis of trends in the progress made</li> </ul>
D.1.9.b	Water and sanitation (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: Rules on water stewardship in codes or contracts: In the contractual annex for suppliers, the Company includes requirements on access to clean toilet facilities, drinkable water and sanitary facilities for food preparation and storage. However, no evidence found in relation to refraining from negatively affecting access to safe water, in line with the UN Sustainable development goals. [Contractual annex, 2014: <a href="http://carrefour.com">carrefour.com</a>]</li> <li>Not met: How working with suppliers on water stewardship issues</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.1.10.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 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>Area: Excessive hours in the supply chain</li> <li>Headline: Excessive working hours at the Xianfeng Stainless Steel Manufactured Products (Linkfair) factory in China</li> <li>Sources: China Labour Watch, 04/02/2016 - <a href="http://chinalaborwatch.org">chinalaborwatch.org</a> Annual report, 31/12/2016</li> </ul> <p>Company website</p> <ul style="list-style-type: none"> <li>Allegation: China Labour Watch alleged excessive working hours at the Xianfeng Stainless Steel Manufactured Products (Linkfair) factory in Guangdong Province, China. The Linkfair factory is a supplier to the Company. The CLW report shows a photograph of a notice displayed at the factory, notifying workers of two product coating mistakes, including on a Carrefour product. CLW alleged that during the high season at Linkfair, workers will have a shift every day of the month without rest, including daily overtime of 2-3 hours. This would result in a worker accumulating between 124-154 hours of overtime in one month during the high season, between three and four times the Chinese legal maximum for overtime work.</li> </ul>
E(1).1	The Company has responded publicly to the allegation	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Not met: Public response available: As far as CHRB has been able to ascertain, the Company has not responded publicly to these allegations.</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			Score 2 • Not met: Response goes into detail
E(1).2	The Company has appropriate policies in place	1	The individual elements of the assessment are met or not as follows: Score 1 • Met: Company policies address the general issues raised: The Company has a supplier policy on working hours. However, the policy makes no requirement that workers have one day off in every seven, nor does it specifically prohibit forced overtime.  The Company has published its Social and Ethical Charter for suppliers on its website. This includes a commitment to 'guarantee workers working hours which comply with international standards and local legislation and do not exceed 48 hours a week excluding overtime (maximum 12 hours of overtime per week, not on a regular basis.' • Met: Policies apply to the type of business relationships involved Score 2 • Not met: Policies address the specific rights in question
E(1).3	The Company has taken appropriate action	0	The individual elements of the assessment are met or not as follows: Score 1 • Not met: Engages with affected stakeholders • Not met: Encourages linked business to engage affected stakeholders • Not met: Provides remedies to affected stakeholders • Not met: Has improved systems and engaged affected stakeholders Score 2 • Not met: Remedies are satisfactory to the victims • Not met: Has improved systems and engaged affected stakeholders

## F. Transparency (10% of Total)

Indicator Code	Indicator name	Score	Explanation
F.1	Company willingness to publish information	1.9 out of 4	Out of a total of 42 indicators assessed under sections A-D of the benchmark, Carrefour made data public that met one or more elements of the methodology in 20 cases, leading to a disclosure score of 1.9 out of 4 points.
F.2	Recognised Reporting Initiatives	2 out of 2	The individual elements of the assessment are met or not as follows: Score 2 • Met: Company reports on GRI • Not met: Company reports on SASB • Not met: Company reports on UNGPRF
F.3	Key, High Quality Disclosures	0.5 out of 4	Carrefour met 1 of the 8 thresholds listed below and therefore gets 0.5 out of 4 points for the high quality disclosure indicator. Specificity and use of concrete examples • Not met: Score 2 for A.2.2 : Board discussions • Not met: Score 2 for B.1.6 : Monitoring and corrective actions • Not met: Score 2 for C.1 : Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers • Not met: Score 2 for C.3 : Users are involved in the design and performance of the channel(s)/mechanism(s) Discussing challenges openly • Not met: Score 2 for B.2.4 : Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts • Not met: Score 2 for C.7 : Remedying adverse impacts and incorporating lessons learned Demonstrating a forward focus • Met: Score 2 for A.2.3 : Incentives and performance management • Not met: Score 2 for B.1.2 : Incentives and performance management

### 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 2018 Key Findings report 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.