CHRB
Corporate Human Rights Benchmark

Corporate Human Rights Benchmark 2019 Company Scoresheet

World Benchmarking Alliance
The CHRB is part of the WBA

Company Name	Foot Locker
Industry	Apparel (Supply Chain and Own Operations)
Overall Score (*)	3.7 out of 100

Theme Score	Out of	For Theme
0.8	10	A. Governance and Policies
0.2	25	B. Embedding Respect and Human Rights Due Diligence
1.3	15	C. Remedies and Grievance Mechanisms
0.3	20	D. Performance: Company Human Rights Practices
0.7	20	E. Performance: Responses to Serious Allegations
0.4	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 2019 Methodology document. For example, a "Not met" under "General HRs Commitment", which is the first bullet point for indicator A.1.1, does not necessarily mean that the company does not have a general commitment to human rights. Rather, it means that the CHRB could not identify a public statement of policy in which the company commits to respecting human rights.

Detailed assessment

A. Governance and Policies (10% of Total)

A.1 Policy Commitments (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1.1	Commitment to respect human rights	1	The individual elements of the assessment are met or not as follows: Score 1 • Met: General HRs commitment: The company states in the Code of Business Conduct that it upholds human rights in all of its operations and facilities and monitors indicators of exploitation of children, physical punishment, abuse and involuntary servitude. [Code of Business Conduct, 2019: footlocker-inc.com] • Not met: UNGC principles 1 & 2 • Not met: UDHR • Not met: International Bill of Rights Score 2 • Not met: UNGPs • Not met: OECD
A.1.2	Commitment to respect the human rights of workers	0.5	The individual elements of the assessment are met or not as follows: Score 1 • Not met: ILO Core • Not met: UNGC principles 3-6 • Not met: Explicitly list ALL four ILO for AP suppliers: Although the Global Sourcing outlines that the Company is concerned about the "safety and fair treatment of the workers who manufacture the goods the Company sells, wherever they are located", the Company did not match all the ILO requirements. Collective bargain was the standard not met. [Global Sourcing Guidelines, 2019: footlocker-inc.com] Score 2 • Not met: Explicit commitment to All four ILO Core • Not met: Respect H&S of workers

Indicator Code	Indicator name	Score (out of 2)	Explanation
			• Met: H&S applies to AP suppliers: According to Footlocker`s Global Sourcing Guidelines, the Company is committed to respect the health and safety of suppliers. [Global Sourcing Guidelines, 2019: footlocker-inc.com] • Not met: working hours for workers: Although Footlocker`s Code of Business Conduct states that the Company 'fully respects all applicable laws that set a minimum wage and maximum hours for employment', no further details found on this issue, including resting periods. [Code of Business Conduct, 2019: footlocker-inc.com] • Not met: Working hours for AP suppliers: According to Footlocker`s Global Sourcing Guidelines, the Company is committed to respect the working hours for suppliers; however, no further details found on this issue, including resting periods. [Global Sourcing Guidelines, 2019: footlocker-inc.com]
A.1.3.AP	Commitment to respect human rights particularly relevant to the industry (AP)	0	The individual elements of the assessment are met or not as follows: Score 1 • Not met: Women's Rights • Not met: Children's Rights • Not met: Migrant worker's rights • Not met: Expecting suppliers to respect these rights Score 2 • Not met: CEDAW/Women's Empowerment Principles • Not met: Child Rights Convention/Business principles • Not met: Convention on migrant workers • Not met: Respecting the right to water • Not met: Expecting suppliers to respect these rights
A.1.4	Commitment to engage with stakeholders	0	The individual elements of the assessment are met or not as follows: Score 1 • Not met: Commits to stakeholder engagement • Not met: Regular stakeholder engagement: According to Footlocker`s 2018 Proxy Statement, the commitment to community is stronger than ever. The Company also claims that "In the aftermath of the storms and natural disasters that touched so many of our customers and associates, our teams rallied together to offer their support and provide hope in the face of despair. In addition to a monetary contribution from the Foot Locker Foundation, Inc.to the American Red Cross and our long-standing partner, the Two Ten Footwear Foundation, we donated footwear and apparel to families in need in the impacted areas." However, this refers to help community rather than actual engagement to discuss issues related to the Company's operations. [Proxy Document, 13/04/2018: footlocker-inc.com] Score 2 • Not met: Commits to engage stakeholders in design • Not met: Regular stakeholder design engagement
A.1.5	Commitment to remedy	0	The individual elements of the assessment are met or not as follows: Score 1 • Not met: Commits to remedy Score 2 • Not met: Not obstructing access to other remedies • Not met: Collaborating with other remedy initiatives • Not met: Work with AP suppliers to remedy impacts
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 • Not met: Zero tolerance attacks on HRs Defenders (HRDs) Score 2 • Not met: Expects AP suppliers to reflect company HRD commitments

A.2 Policy Commitments (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.2.1	Commitment from the top	0	The individual elements of the assessment are met or not as follows: Score 1 • Not met: CEO or Board approves policy • Not met: Board level responsibility for HRs: According to the 2019 Proxy Statement, The Company and the Board of Directors (the “Board”) are focused on corporate social responsibility. Our ESG priorities are centered on: Opportunity, Community, Worker Dignity and Sustainability". However, it is not clear if the Board is tasked with specific oversight of respect for human rights. [Proxy Document, 12/04/2019: footlocker-inc.com] Score 2 • Not met: Speeches/letters by Board members or CEO

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.2.2	Board discussions	0	The individual elements of the assessment are met or not as follows: Score 1 • Not met: Board/Committee review of salient HRs: The Company discloses that the 'Board has oversight responsibilities regarding risks that could affect the Company. This oversight is conducted primarily through the Audit Committee. The Audit Committee has established procedures for reviewing the Company's risks. These procedures include regular risk monitoring by management to update current risks and identify potential new and emerging risks, quarterly risk reviews by management with the Audit Committee, and an annual risk report to the full Board'. However, there is no description about review of Company's salient human rights issues. [Proxy Document, 12/04/2019: footlocker-inc.com] • Not met: Examples or trends re HR discussion Score 2 • Not met: Both examples and process
A.2.3	Incentives and performance management	0	The individual elements of the assessment are met or not as follows: Score 1 • Not met: Incentives for at least one board member • Not met: At least one key AP HR risk, beyond employee H&S Score 2 • Not met: Performance criteria made public

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	The individual elements of the assessment are met or not as follows: Score 1 • Not met: Commits to ILO core conventions • Not met: Senior responsibility for HR Score 2 • Not met: Day-to-day responsibility [Conflict Minerals Policy, April,2016: ttps://footlocker-inc.com Sustentaveis\EIRIS Foundation\05. Planilha e base de dados\Empresas\Planilha_Footlocker.xlsx#'Sources summary'!B] • Not met: Day-to-day responsibility for AP in supply chain: According to the Footlocker Conflict Minerals Policy, the Company "has initiated a comprehensive process to comply with the rule and is taking steps to increase its supply chain due diligence measures as they relate to Conflict Minerals in its supply chain." However, the Company does not state how day to day responsibility for managing human rights issues within its supply chain is allocated. [Conflict Minerals Policy, April,2016: ttps://footlocker-inc.com Sustentaveis\EIRIS Foundation\05. Planilha e base de dados\Empresas\Planilha_Footlocker.xlsx#'Sources summary'!B]
B.1.2	Incentives and performance management	0	The individual elements of the assessment are met or not as follows: Score 1 • Not met: Senior manager incentives for human rights • Not met: At least one key AP HR risk, beyond employee H&S Score 2 • Not met: Performance criteria made public
B.1.3	Integration with enterprise risk management	0	The individual elements of the assessment are met or not as follows: Score 1 • Not met: HR risks is integrated as part of enterprise risk system Score 2 • Not met: Audit Ctte or independent risk assessment
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 • Not met: Commits to ILO core conventions • Not met: Communicates its policy to all workers in own operations Score 2 • Not met: Commits to all 4 ILO core conventions • Not met: Communication of policy commitments to stakeholder • Not met: How policy commitments are made accessible to audience
B.1.4.b	Communication /dissemination of policy commitment(s)	0.5	The individual elements of the assessment are met or not as follows: Score 1 • Not met: Commits to all 4 ILO core conventions for suppliers • Not met: Communicating policy down the whole AP supply chain • Not met: Requiring AP suppliers to communicate policy down the chain

Indicator Code	Indicator name	Score (out of 2)	Explanation
	to business relationships		Score 2 • Not met: How HR commitments made binding/contractual • Met: Including on AP suppliers: According to the Global Sourcing Guidelines, the Company states that the "supplier will not utilize subcontractors in the manufacturing of products for Foot Locker without Foot Locker's prior written approval and only after subcontractor has agreed to comply with these Global Sourcing Guidelines. " [Global Sourcing Guidelines, 2019: footlocker-inc.com]
B.1.5	Training on Human Rights	0	The individual elements of the assessment are met or not as follows: Score 1 • Not met: Scores at least 1 on A.1.2 • Not met: Trains all workers on HR policy commitments • Not met: Trains relevant AP managers including procurement Score 2 • Not met: Score of 2 on A.1.2 • Not met: Both requirements under score 1 met
B.1.6	Monitoring and corrective actions	0	The individual elements of the assessment are met or not as follows: Score 1 • Not met: Scores at least 1 on A.1.2 • Not met: Monitoring implementation of HR policy commitments • Not met: Monitoring AP suppliers Score 2 • Not met: Score of 2 on A.1.2 • Not met: Describes corrective action process • Not met: Example of corrective action • Not met: Discloses % of AP supply chain monitored
B.1.7	Engaging business relationships	0	The individual elements of the assessment are met or not as follows: Score 1 • Not met: HR affects AP selection of suppliers • Not met: HR affects on-going AP supplier relationships Score 2 • Not met: Both requirement under score 1 met • Not met: Working with AP suppliers to improve performance
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 • Not met: Stakeholder process or systems • Not met: Frequency and triggers for engagement • Not met: Workers in AP SC engaged • Not met: Communities in the AP SC engaged Score 2 • Not met: Analysis of stakeholder views and company's actions on them

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 • Not met: Identifying risks in own operations • Not met: Identifying risks in AP suppliers [Conflict Minerals Policy, April,2016: ttps://footlocker-inc.com Sustentaveis\EIRIS Foundation\05. Planilha e base de dados\Empresas\Planilha_Footlocker.xlsx#'Sources summary'!B] Score 2 • Not met: Ongoing global risk identification • Not met: In consultation with stakeholders • Not met: In consultation with HR experts • Not met: Triggered by new circumstances
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 • Not met: Salient risk assessment (and context) • Not met: Public disclosure of salient risks Score 2 • Not met: Both requirements under score 1 met
B.2.3	Integrating and Acting: Integrating assessment	0	The individual elements of the assessment are met or not as follows: Score 1 • Not met: Action Plans to mitigate risks • Not met: Including in AP supply chain • Not met: Example of Actions decided

Indicator Code	Indicator name	Score (out of 2)	Explanation
	findings internally and taking appropriate action		Score 2 • Not met: Both requirements under score 1 met
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 • Not met: System to check if Actions are effective • Not met: Lessons learnt from checking effectiveness Score 2 • Not met: Both requirement under score 1 met
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 • Not met: Comms plan re identifying risks • Not met: Comms plan re assessing risks • Not met: Comms plan re action plans for risks • Not met: Comms plan re reviewing action plans • Not met: Including AP suppliers Score 2 • Not met: Responding to affected stakeholders concerns • Not met: Ensuring affected stakeholders can access communications

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 • Met: Channel accessible to all workers: Footlocker has a Code of Business Conduct Hotline, which is managed by an independent third party and is available 24 hours a day, 7 days a week in multiple languages. [Code of Business Conduct, 2019: footlocker-inc.com] Score 2 • Not met: Number grievances filed, addressed or resolved • Met: Channel is available in all appropriate languages: The Code of Business Conduct Hotline is managed by an independent third party and is available 24 hours a day, 7 days a week in multiple languages. The Hotline accepts anonymous complaints or concerns, where allowed by local law. [Code of Business Conduct, 2019: footlocker-inc.com] • Not met: Expect AP supplier to have equivalent grievance systems: It is not clear if the grievance channels applies to its suppliers [Code of Business Conduct, 2019: footlocker-inc.com & Global Sourcing Guidelines, 2019: footlocker-inc.com] • Not met: Opens own system to AP supplier workers: Although the Company has a Hotline to receive complaints or concerns, It is not clear if the grievance channels applies to its suppliers. [Code of Business Conduct, 2019: footlocker-inc.com & Global Sourcing Guidelines, 2019: footlocker-inc.com]
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 • Not met: Grievance mechanism for community Score 2 • Not met: Describes accessibility and local languages • Not met: Expects AP supplier to have community grievance systems • Not met: AP supplier communities use global system
C.3	Users are involved in the design and performance of the channel(s)/mechanism(s)	0	The individual elements of the assessment are met or not as follows: Score 1 • Not met: Engages users to create or assess system • Not met: Description of how they do this Score 2 • Not met: Engages with users on system performance • Not met: Provides user engagement example on performance • Not met: AP suppliers consult users in creation or assessment

Indicator Code	Indicator name	Score (out of 2)	Explanation
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 • Not met: Response timescales • Not met: How complainants will be informed Score 2 • Not met: Escalation to senior/independent level
C.5	Commitment to non-retaliation over complaints or concerns made	0	The individual elements of the assessment are met or not as follows: Score 1 • Not met: Public statement prohibiting retaliation: According to Foot Locker`s Code of Conduct, there is a Zero Tolerance for Retaliation policy. Moreover the Company states that it "does not tolerate retaliation for making a good faith report, for asking questions, or for cooperating in an investigation—even if the concern turns out to be unfounded." However; the company does not mention if this policy comprise external stakeholders; [Code of Business Conduct, 2019: footlocker-inc.com] • Not met: Practical measures to prevent retaliation: According to their COBC, at Foot Locker, there is Zero Tolerance for Retaliation. Moreover the Company states" The Code of Business Conduct Hotline is managed by an independent third party and is available 24 hours a day, 7 days a week, in multiple languages. Concerns to the Hotline can be made anonymously, where allowed by local law." However, is not clear which practical measures are in place where anonymity is not an option. [Code of Business Conduct, 2019: footlocker-inc.com] Score 2 • Not met: Has not retaliated in practice • Not met: Expects AP suppliers to prohibit retaliation
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 • Not met: Won't impede state based mechanisms • Not met: Complainants not asked to waive rights Score 2 • Not met: Will work with state based or non judicial mechanisms • Not met: Example of issue resolved (if applicable)
C.7	Remedying adverse impacts and incorporating lessons learned	0	The individual elements of the assessment are met or not as follows: Score 1 • Not met: Describes how remedy has been provided • Not met: Says how it would remedy key sector risks Score 2 • Not met: Changes introduced to stop repetition • Not met: Approach to learning from incident to prevent future impacts • Not met: Evaluation of the channel/mechanism

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.2.1.a	Living wage (in own production or manufacturing operations)	0	The individual elements of the assessment are met or not as follows: Score 1 • Not met: Living wage target timeframe: However, the Company does not seem to have own manufacturing operations, as its business activities consist in operating 'mall-based stores, as well as stores in high-traffic urban retail areas and high streets'. [10K, 01/04/2019: last10k.com] • Not met: Describes how living wage determined Score 2 • Not met: Achieved payment of living wage • Not met: Regularly review definition of living wage with unions
D.2.1.b	Living wage (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 • Not met: Living wage in supplier code or contracts: According to the Global Sourcing Guidelines, Foot Locker will only deal with suppliers who pay their employees fairly by providing wages, overtime premiums and benefits that, at very least, comply with legally mandated minimum standards. However, no evidence found on living wage. [Global Sourcing Guidelines, 2019: footlocker-inc.com] • Not met: Improving living wage practices of suppliers Score 2 • Not met: Both requirements under score 1 met • Not met: Provide analysis of trends demonstrating progress

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.2.2	Aligning purchasing decisions with human rights	0	The individual elements of the assessment are met or not as follows: Score 1 • Not met: Avoids business model pressure on HRs • Not met: Positive incentives to respect human rights Score 2 • Not met: Both requirements under score 1 met
D.2.3	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 product source Score 2 • Not met: Discloses significant parts of supply chain and why
D.2.4.a	Prohibition on child labour: Age verification and corrective actions (in own production or manufacturing operations)	0	The individual elements of the assessment are met or not as follows: Score 1 • Not met: Does not use child labour: However, the Company does not seem to have own manufacturing operations, as its business activities consist in operating 'mall-based stores, as well as stores in high-traffic urban retail areas and high streets'. [10K, 01/04/2019: last10k.com] • Not met: Age verification of job applicants and workers Score 2 • Not met: Remediation if children identified
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 • Not met: Child Labour rules in codes or contracts: According to the Global Sourcing Guidelines, The Company does not use child labor. However; the commitment is not enough as it does not explicit indicates child labour rules in codes or contracts. [Global Sourcing Guidelines, 2019: footlocker-inc.com] • Not met: How working with suppliers on child labour: The Global Sourcing Guidelines highlights that child labor is not permitted. "Workers may not be younger than 15 years of age (or 14 where local law permits) or the age for completing compulsory education, if higher." However; the Company does not describe how it works with suppliers to eliminate child labour and to improve working conditions for young workers. [Global Sourcing Guidelines, 2019: footlocker-inc.com] Score 2 • Not met: Both requirements under score 1 met • Not met: Provide analysis of trends demonstrating progress
D.2.5.a	Prohibition on forced labour: Debt bondage and other unacceptable financial costs (in own production or manufacturing operations)	0	The individual elements of the assessment are met or not as follows: Score 1 • Not met: Pays workers in full and on time: However, the Company does not seem to have own manufacturing operations, as its business activities consist in operating 'mall-based stores, as well as stores in high-traffic urban retail areas and high streets'. [10K, 01/04/2019: last10k.com] • Not met: Payslips show any legitimate deductions Score 2 • Not met: How these practices are implemented and monitored for agencies, labour brokers or recruiters
D.2.5.b	Prohibition on 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 • Not met: How working with suppliers on debt & fees Score 2 • Not met: Both requirements under score 1 met • Not met: Provide analysis of trends in progress made
D.2.5.c	Prohibition on forced labour: Restrictions on workers (in own production or manufacturing operations)	0	The individual elements of the assessment are met or not as follows: Score 1 • Not met: Does not retain documents or restrict movement: However, the Company does not seem to have own manufacturing operations, as its business activities consist in operating 'mall-based stores, as well as stores in high-traffic urban retail areas and high streets'. [10K, 01/04/2019: last10k.com] Score 2 • Not met: How sure about agencies or brokers

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.2.5.d	Prohibition on 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 • Not met: How these practices are implemented and monitored for agencies, labour brokers or recruiters Score 2 • Not met: Both requirements under score 1 met • Not met: Provide analysis of trends in progress made
D.2.6.a	Freedom of association and collective bargaining (in own production or manufacturing operations)	0	The individual elements of the assessment are met or not as follows: Score 1 • Not met: Commits not to interfere with union rights and collective bargaining and prohibits intimidation and retaliation: However, the Company does not seem to have own manufacturing operations, as its business activities consist in operating 'mall-based stores, as well as stores in high-traffic urban retail areas and high streets'. [10K, 01/04/2019: last10k.com] • Not met: Discloses % covered by collective bargaining Score 2 • Not met: Both requirement under score 1 met
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 • Not met: FoA & CB rules in codes or contracts: Although Foot Locker states that it "will only do business with suppliers whose workers are, in all cases, present voluntarily, compensated fairly and allowed the right of free association and who are neither put at risk of physical harm, discriminated against, nor exploited in any way", there is no explicit mention to collective bargaining requirements. • Not met: How working with suppliers on FoA and CB Score 2 • Not met: Both requirements under score 1 met
D.2.7.a	Health and safety: Fatalities, lost days, injury rates (in own production of manufacturing operations)	0	The individual elements of the assessment are met or not as follows: Score 1 • Not met: Injury Rate disclosures: However, the Company does not seem to have own manufacturing operations, as its business activities consist in operating 'mall-based stores, as well as stores in high-traffic urban retail areas and high streets'. [10K, 01/04/2019: last10k.com] • Not met: Lost days or near miss disclosure • Not met: Fatalities disclosures Score 2 • Not met: Set targets for H&S performance • Not met: Met targets or explains why not
D.2.7.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 • Met: Sets out clear Health and Safety requirements: According to the Global Sourcing Guideline, Foot Locker will only deal "with suppliers who provide their employees with a safe and healthy work environment, designed to prevent accidents and injury to health arising out of or occurring in the course of work. At the very least, the Company requires that its suppliers comply with all applicable, legally mandated minimum standards for workplace health and safety." [Global Sourcing Guidelines, 2019: footlocker-inc.com] • Not met: Injury rate disclosures • Not met: Lost days or near miss disclosures • Not met: Fatalities disclosures Score 2 • Not met: How working with suppliers on H&S • Not met: Provide analysis of trends in progress made
D.2.8.a	Women's rights (in own production or manufacturing operations)	0	The individual elements of the assessment are met or not as follows: Score 1 • Not met: Process to stop harassment and violence: However, the Company does not seem to have own manufacturing operations, as its business activities consist in operating 'mall-based stores, as well as stores in high-traffic urban retail areas and high streets'. [10K, 01/04/2019: last10k.com] • Not met: Working conditions take account of gender • Not met: Equality of opportunity at all levels Score 2 • Not met: Meets all of the requirements under score 1
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 • Not met: Women's rights in codes or contracts • Not met: How working with suppliers on women's rights

Indicator Code	Indicator name	Score (out of 2)	Explanation
			Score 2 • Not met: Both requirement under score 1 met • Not met: Provide analysis of trends in progress made
D.2.9.a	Working hours (in own production or manufacturing operations)	0	The individual elements of the assessment are met or not as follows: Score 1 • Not met: Respects max hours, min breaks and rest periods in its own operations: However, the Company does not seem to have own manufacturing operations, as its business activities consist in operating 'mall-based stores, as well as stores in high-traffic urban retail areas and high streets'. [10K, 01/04/2019: last10k.com] Score 2 • Not met: How it implements and checks this
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 • Not met: Working hours in codes or contracts: According to Foot Locker`s Code of Conduct, the Company fully respects all applicable laws that set a minimum wage and maximum hours for employment. However, no further details was found regarding codes or contracts. [Code of Business Conduct, 2019: footlocker-inc.com] • Not met: How working with suppliers on working hours Score 2 • Not met: Both requirements under score 1 met • Not met: Provide analysis of trends in progress made

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
E(1).0	Serious allegation No 1		No allegations meeting the CHRB severity threshold were found, and so the score of 2.96 out of 80 points scored in themes A-D & F has been applied to produce a score of 0.74 out of 20 points for theme E.

F. Transparency (10% of Total)

Indicator Code	Indicator name	Score	Explanation
F.1	Company willingness to publish information	0.42 out of 4	Out of a total of 48 indicators assessed under sections A-D of the benchmark, Foot Locker made data public that met one or more elements of the methodology in 5 cases, leading to a disclosure score of 0.42 out of 4 points.
F.2	Recognised Reporting Initiatives	0 out of 2	The individual elements of the assessment are met or not as follows: Score 2 • Not met: Company reports on GRI • Not met: Company reports on SASB • Not met: Company reports on UNGPRF
F.3	Key, High Quality Disclosures	0 out of 4	Foot Locker met 0 of the 10 thresholds listed below and therefore gets 0 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 • Not met: Score 2 for A.2.3 : Incentives and performance management • Not met: Score 2 for B.1.2 : Incentives and performance management • Not met: Score 1 for D.2.1.a : Living wage (in own production or manufacturing operations) • Not met: Score 2 for D.2.7.a : Health and safety: Fatalities, lost days, injury rates (in own production of manufacturing operations)

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