

Company Name Gildan Activewear
Industry Apparel (Supply Chain and Own Operations)
Overall Score (*) 33.2 out of 100

| Theme Score | Out of | For Theme |
|-------------|--------|---|
| 3.2 | 10 | A. Governance and Policies |
| 5.2 | 25 | B. Embedding Respect and Human Rights Due Diligence |
| 4.2 | 15 | C. Remedies and Grievance Mechanisms |
| 6.1 | 20 | D. Performance: Company Human Rights Practices |
| 10.0 | 20 | E. Performance: Responses to Serious Allegations |
| 4.5 | 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 |
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| A.1.1 | Commitment to respect human rights | 1 | The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Met: UDHR: The Company states that 'we adhere to the Universal Declaration of Human Rights and support the fair, equal treatment of all individuals'. [Code of Ethics: genuineresponsibility.com] Score 2 <ul style="list-style-type: none"> Not met: UNGPs: The Company states that 'Gildan is guided by the articles set forth in the United Nation's Universal Declaration of Human Rights as well as its Guiding Principles on Business and Human Rights'. Moreover, in its CSR 2018, the company indicates that 'our Human Rights Policy, which is based on the United Nations' Guiding Principles, sets clear standards that Gildan-owned manufacturing facilities as well as its contractors are required to follow'. However, the use of the wording 'guided by' or 'based on' is not considered a formal commitment to the principles according to the wording CHRB criteria. [Human Rights Policy Statement, 05/2017: genuineresponsibility.com & CSR Report 2018, 2019: genuineresponsibility.com] Not met: OECD: No further information found in the guidebook. [Social and Sustainable Guidebook 2019, 2019: genuineresponsibility.com] |
| 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 <ul style="list-style-type: none"> Met: ILO Core: The Code of Conduct requires both employees and business partners to adhere to it. It includes the following issues: child labour, forced labour, compensation, hours of work/overtime, health and safety, environment, freedom |

| Indicator Code | Indicator name | Score (out of 2) | Explanation |
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| | | | <p>of association, collective bargaining, harassment or abuse, grievance procedures as well as non-discrimination. [Code of conduct: genuineresponsibility.com]</p> <ul style="list-style-type: none"> • Met: Explicitly list ALL four ILO for AP suppliers: The Gildan's code of conduct covers both Gildan's operations and business partners, and explicitly covers each ILO core area: Child Labour, Forced Labour, Freedom of Association and Collective Bargaining, Discrimination. The code states that 'Gildan and its business partners will recognize and respect the right of employees to Freedom of Association and Collective Bargaining'. [Code of conduct: genuineresponsibility.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Explicit commitment to All four ILO Core: As indicated above, the Code of conduct explicitly covers each ILO core area. In relation to freedom of association and collective bargaining, the code states that 'Gildan and its business partners will recognize and respect the right of employees to Freedom of Association and Collective Bargaining'. [Code of conduct: genuineresponsibility.com] • Met: Respect H&S of workers: In the Code of Conduct, it is stated that "Gildan and its business partners states that will take all necessary measure to provide a safe and healthy workplace setting to prevent accidents and illnesses arising out of, linked with, or occurring in the course of work or as a result of the operation of employers' facilities and other locations" [Code of conduct: genuineresponsibility.com] • Met: H&S applies to AP suppliers: See above the commitment on health and safety contained in the code of conduct. The code of conduct applies to both Company's employees and suppliers. [Code of conduct: genuineresponsibility.com] • Met: working hours for workers: The Code of conduct contains requirements on 'employees must not be required to work more than a total of 60 hours per week or the regular and overtime hours allowed by the law of the country, whichever is less. The regular work week shall not exceed 48 hours. In addition, 'all overtime work shall be consensual. Employees shall not request overtime on a regular basis and shall compensate all overtime work at a premium rate'. [Code of conduct: genuineresponsibility.com] • Met: Working hours for AP suppliers: See above the commitment on working hours contained in the code of conduct. The code of conduct applies to both Company's employees and suppliers. [Code of conduct: genuineresponsibility.com] |
| 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"> • Not met: Women's Rights: The company indicates that it has a 'commitment to maintaining industry-leading working conditions and labour practices at each of our worldwide locations by (among others) empowering women at work. However, no publicly available commitment to respecting women's rights found. No further evidence found in the Social and Sustainable Guidebook. [CSR Report 2018, 2019: genuineresponsibility.com & Social and Sustainable Guidebook 2019, 2019: genuineresponsibility.com] • Not met: Children's Rights [CSR Report 2018, 2019: genuineresponsibility.com & Social and Sustainable Guidebook 2019, 2019: genuineresponsibility.com] • Not met: Migrant worker's rights: The company indicates that 'as part of our commitment to respecting human rights in October of 2018, Gildan joined the Industry Commitment to Responsible Recruitment Developed in conjunction with the American Apparel & Footwear Association and the Fair Labor Association. The commitment is a proactive industry effort to address potential forced labor risks for migrant workers in the global supply chain. Signatories of the commitments must ensure that no workers pay for their job, workers retain control of their travel documents and have full freedom of movement. In addition, all workers are informed of the basic terms of their employment before leaving home'. However, this commitment only applies to the supply chain. No further evidence found. [CSR Report 2018, 2019: genuineresponsibility.com] • Not met: Expecting suppliers to respect these rights: The company indicates that 'as part of our commitment to respecting human rights in October of 2018, Gildan joined the Industry Commitment to Responsible Recruitment Developed in conjunction with the American Apparel & Footwear Association and the Fair Labor Association. The commitment is a proactive industry effort to address potential forced labor risks for migrant workers in the global supply chain. Signatories of the commitments must ensure that no workers pay for their job, workers retain control of their travel documents and have full freedom of movement. In addition, all workers are informed of the basic terms of their employment before leaving home'. However, it is not clear if this commitment is made by the company and/or if suppliers are expected to respect these rights. [CSR Report 2018, 2019: genuineresponsibility.com] |

| Indicator Code | Indicator name | Score (out of 2) | Explanation |
|----------------|--|------------------|--|
| | | | <p>Score 2</p> <ul style="list-style-type: none"> • 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 | 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"> • Met: Commits to stakeholder engagement: The Company is committed to, among other actions, 'identify our stakeholders and communicate in a timely and responsive manner to ensure successful engagement', 'assess our social performance through direct consultation with our neighbours and social partners' and 'manage external risks by understanding the impacts our operations can have on our stakeholders and promote effective working relationships'. [Stakeholders and Partners Policy Statement, 05/2017: genuineresponsibility.com] • Met: Regular stakeholder engagement: The company lists a series of engagements with different stakeholders including the type of activity, the frequency of the engagement, the concerns and the material topic. [CSR Report 2018, 2019: genuineresponsibility.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Commits to engage stakeholders in design: The company indicates that 'one of the key areas we believe our stakeholders can help provide insight for us is in improving the lives of the people involved in manufacturing our products, ensuring an ethical and stimulating work environment and respecting and enhancing the local communities in which we operate. We invite groups representing workers, students, colleges, trade unions, academia, governments, local communities and consumers to communicate, share ideas and build consensus on these issues with us'. However, no publicly available statement of policy which also commits to engaging with affected stakeholders and/or their legitimate representatives in the development or monitoring of its human rights approach found. [CSR Report 2018, 2019: genuineresponsibility.com] • Not met: Regular stakeholder design engagement: The company lists a series of engagements with different stakeholders including the type of activity, the frequency of the engagement, the concerns and the material topic. However, although human rights appear to be part of its material topic, it is not clear that the company regularly engages with affected stakeholders and their legitimate representatives in the development or monitoring of its human rights approach. [CSR Report 2018, 2019: genuineresponsibility.com] |
| 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"> • Not met: Commits to remedy: The company indicates that 'once we enter into a relationship with a third-party contractor, our regional social compliance teams work with contractors to educate and assist the development of sound labour practices, effective labour compliance management systems, policies and procedures, and implement remediation where required'. However, no publicly available statement found of policy committing it to remedy the adverse impacts on individuals, workers and communities that it has caused or contributed to. [CSR Report 2018, 2019: genuineresponsibility.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Not obstructing access to other remedies • Not met: Collaborating with other remedy initiatives • Not met: Work with AP suppliers to remedy impacts: The company indicates that 'following an internal audit at a company-owned or third-party contractor facility. (...) Your teams use a root-cause analysis process to systematically identify the root cause of every major and moderate non-compliance raised during the audit process in order to prevent similar issues from reoccurring. Recurrent findings are given special attention to ensure that proper remediation is implemented'. However, no commitment which also includes working with its suppliers to remedy adverse impacts found (through the business relationship's own mechanisms or through collaborating in the development of third party non-judicial remedies). [CSR Report 2018, 2019: genuineresponsibility.com] |
| 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"> • Not met: Zero tolerance attacks on HRs Defenders (HRDs): Although the Company is committed to not retaliate against anyone that in good faith reports possible violations of the code, no evidence found of a general statement of commitment to not tolerate nor contribute to intimidation or attacks against human rights defenders (any one who opposes the Company's activities due to human rights). In |

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| | | | <p>addition, the company indicates that 'we also offer options to report grievances anonymously at all of our administrative offices and manufacturing facilities, including through our Integrity and Social Responsibility Hotline and in suggestion boxes. In all cases, employees can report their grievances without fear of reprisals'. However, as indicated, no publicly available statement found of a policy committing it to neither tolerate nor contribute to threats, intimidation and attacks (both physical and legal) against human rights defenders. It must be a commitment covering stakeholders beyond company's employees. No further evidence found in the Social and Sustainable Compliance Guidebook. [Code of Ethics: genuineresponsibility.com & CSR Report 2018, 2019: genuineresponsibility.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • 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 | 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"> • Met: CEO or Board approves policy: The Code of ethics, that contains a human rights commitment, is prefaced and signed by the President & CEO [Code of Ethics: genuineresponsibility.com] • Met: Board level responsibility for HRs: The company indicates that 'the Code of Ethics addresses several matters, including conflicts of interest, integrity of corporate records, confidentiality of corporate information, protection and use of corporate assets and opportunities, employee relations, protection of human rights, health and safety, anti-corruption laws, insider trading, compliance with laws and reporting of unethical or illegal behaviour. The Corporate Governance and Social Responsibility Committee is responsible for monitoring compliance with the Code of Ethics'. [Corporate Governance Guidelines, 09/09/2016: gildancorp.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Speeches/letters by Board members or CEO: In the company's Annual Report 2018, the Chairman states that 'Our ongoing commitment to leading governance standards continues to frame the Company's actions and strategies in the area of Ethics and Compliance'. The vice-president states in Gildan's CSR 2018 that 'Over the last year, we have continued to concentrate our efforts on those issues most material to our stakeholders, including a critical focus on human and labour rights, health and safety as well as traceability'. However, CHRB is looking for Board members and/or the CEO make speeches, presentations or other communications setting out the Company's approach to human rights or discussing its business importance. [CSR Report 2018, 2019: genuineresponsibility.com & Annual Report 2018, 2019: gildancorp.com] |
| A.2.2 | Board discussions | 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"> • Met: Board/Committee review of salient HRs: The company indicates that 'The Compliance Steering Committee is an executive-level management committee that operates under the leadership of the President and Chief Executive Officer and is responsible for overseeing the Company's global compliance programs in such areas as ethics, environment, labour, health and safety and sustainability, among others. The Compliance Steering Committee is ultimately accountable to the Board of Directors and reports on important compliance matters to the Board's Corporate Governance and Social Responsibility Committee on a quarterly basis'. These quarterly meeting reports to the Board's committee include highlights on key developments, issues and risks in these areas. [CSR Report 2018, 2019: genuineresponsibility.com] • Not met: Examples or trends re HR discussion: The company indicates that 'Respect to human rights is supervised by our Corporate Citizenship department, validating compliance through our Social Compliance audit program and reporting any violation to human rights on a quarterly basis to our Board of Directors (...). The Human Resources team plays a key role in ensuring respect to human rights on a day-to-day basis'. However, it was not found any example of specific human rights issues discussed or examples of trends in types if human rights issues discussed at Board level or a Board committee during the Company's last reporting period. [CSR Report 2018, 2019: genuineresponsibility.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both examples and process |

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| A.2.3 | Incentives and performance management | 0 | The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Incentives for at least one board member • Not met: At least one key AP HR risk, beyond employee H&S Score 2 <ul style="list-style-type: none"> • 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 | 1.5 | The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Commits to ILO core conventions: See indicator A.1.2 • Met: Senior responsibility for HR: The company indicates that 'The Compliance Steering Committee is an executive-level management committee that operates under the leadership of the President and Chief Executive Officer and is responsible for overseeing the Company's global compliance programs in such areas as ethics, environment, labour, health and safety and sustainability, among others. The Compliance Steering Committee is ultimately accountable to the Board of Directors and reports on important compliance matters to the Board's Corporate Governance and Social Responsibility Committee on a quarterly basis'. [CSR Report 2018, 2019: genuineresponsibility.com] Score 2 <ul style="list-style-type: none"> • Met: Day-to-day responsibility: The company indicates that 'Respect to human rights is supervised by our Corporate Citizenship department, validating compliance through our Social Compliance audit program and reporting any violation to human rights on a quarterly basis to our Board of Directors (...). The Human Resources team plays a key role in ensuring respect to human rights on a day-to-day basis'. Moreover, 'Our Social Compliance team is composed of experienced, certified auditors of labour, health and safety, and environmental considerations. Employees in these positions undergo a series of training sessions when they are first hired, and receive regular training in emerging labour risks, personalized training plans, and annual performance evaluations to ensure they continue to have all the capabilities needed to fulfil their responsibilities and develop their skills. They monitor compliance at Company-owned and contractor facilities through various tools including regular audits'. [CSR Report 2018, 2019: genuineresponsibility.com] • Not met: Day-to-day responsibility for AP in supply chain |
| 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"> • Not met: Senior manager incentives for human rights: No evidence found of an incentive or performance management scheme linked to aspects of its human rights policy commitment for at least one senior manager, including in the public sources referenced by the Company to CHRB. [CSR Report 2018, 2019: genuineresponsibility.com] Score 2 <ul style="list-style-type: none"> • Not met: At least one key AP HR risk, beyond employee H&S • Not met: Performance criteria made public |
| 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"> • Met: HR risks is integrated as part of enterprise risk system: In the context of its Risk Management, the company indicates that 'the Corporate Governance and Social responsibility Committee of the Board monitors compliance with the Company's policies and practices relating to business ethics, bribery and corruption, corporate social responsibility, environmental compliance, security and product safety'. Moreover, in the Annual Report 2018, the Company describes the risk and uncertainties that could have a material and adverse effect, included in risk management. These risks include 'changes in domestic and foreign laws governing our relationships with our employees, including wage and human resources laws and regulations, fair labour standards, overtime pay, unemployment tax rates, workers' compensation rates, and payroll taxes, would likely have a direct impact on our operating costs'. Finally, 'We may experience negative publicity as a result of actual, alleged, or perceived violations of labour laws or international labour standards, unethical labour, and other business practices'. [CSR Report 2018, 2019: genuineresponsibility.com & Annual Report 2018, 2019: gildancorp.com] |

| Indicator Code | Indicator name | Score (out of 2) | Explanation |
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| | | | Score 2 <ul style="list-style-type: none"> Not met: Audit Ctte or independent risk assessment |
| B.1.4.a | Communication /dissemination of policy commitment(s) within Company's own operations | 1 | The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Met: Commits to ILO core conventions: See indicator A.1.2 Met: Communicates its policy to all workers in own operations: The company indicates that 'Every year, we run several mandatory review and re-certification programs related to the Company's codes and policies (...). Regarding the Code of Ethics ' All new employees are required, as part of the Company's onboarding process, to acknowledge that they have read and understood the Code of Ethics'. With respect to the Code of Conduct, 'The Code has been translated into all of the main languages spoken in the areas where our products are made including English, French, Spanish, Haitian Creole, Polish, Bengali, Chinese, Vietnamese, Khmer, Urdu, Korean, Italian, Hindi, Tami and Sinhalese, and is prominently displayed in all of our owned and third-party contractor facilities. Code of Conduct training is performed annually through a variety of mechanisms, including online platforms, and interactive programs such as presentations and workshops'. Both Codes contain the company's human rights policy. [CSR Report 2018, 2019: genuineresponsibility.com] Score 2 <ul style="list-style-type: none"> Met: Commits to all 4 ILO core conventions: See indicator A.1.2 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) to business relationships | 0.5 | The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Met: Commits to all 4 ILO core conventions for suppliers: See indicator A.1.2 Not met: Communicating policy down the whole AP supply chain: The Company states that 'the labour standards set forth in our Code of Conduct are complemented by specific procedures and practical requirements explained in Gildan's Sustainable Social and Environmental Compliance Guidebook, which is provided to all our manufacturing contractors'. Also, 'in 2019, we will begin training contractors on our updated Social and Sustainable Compliance Guidebook, which now includes additional benchmarks and emerging risks including migrant workers, modern slavery, and child labor, as well as updates reflecting the 2017 changes to our Code of Conduct. The Guidebook provides guidelines for social compliance and is aligned with the FLA and international labour standards. We look to have all our contractors worldwide trained on this by 2020'. However, this shows future intentions, no evidence found on whether it is already being carried out. Finally, in its Sustainable Social and Environmental Compliance Guidebook, the company expects its suppliers to 'where applicable, require their direct suppliers to comply with prohibitions against the use of slave/forced labor or human trafficking and engage in verification of their supply chain to assess and address risks of slave/forced labor and human trafficking'. However, although the Company communicates the code guidebook to all manufacturing contractors, no evidence found on whether it actively communicates all its commitments down the supply chain or requires its suppliers to do so, as it seems that requirements down the supply chain are focused strictly in modern slavery and forced labour. No further information found. [Supply Chain Transparency, 25/02/2019 & CSR Report 2018, 2019: genuineresponsibility.com] Not met: Requiring AP suppliers to communicate policy down the chain Score 2 <ul style="list-style-type: none"> Met: How HR commitments made binding/contractual: The company indicates that 'our Code of Conduct also serves as a guideline to respect human rights in our owned facilities. Compliance with our Code of Conduct is a condition of doing business with us, and all our contractors must consent through their commercial agreements that they have received, understood and acknowledge our Code'. [CSR Report 2018, 2019: genuineresponsibility.com] Not met: Including on AP suppliers |
| B.1.5 | Training on Human Rights | 2 | The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Met: Scores at least 1 on A.1.2 Met: Trains all workers on HR policy commitments: The Company indicates that 'all employees have participated in an interactive on-line course on our Code of Ethics, during 2016, and an interactive on-line course on our code of conduct during 2017'. Met: Trains relevant AP managers including procurement: In addition to training mentioned above, the Company states that 'we also offer regular specific training to our internal monitoring teams who work closely with our management teams |

| Indicator Code | Indicator name | Score (out of 2) | Explanation |
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| | | | <p>and our contractors, to ensure that they are knowledgeable on our requirements and understand the issues related to social compliance and human rights'. Score 2</p> <ul style="list-style-type: none"> • Met: Score of 2 on A.1.2 • Met: Both requirements under score 1 met |
| B.1.6 | Monitoring and corrective actions | 1.5 | <p>The individual elements of the assessment are met or not as follows: Score 1</p> <ul style="list-style-type: none"> • Met: Scores at least 1 on A.1.2 • Met: Monitoring implementation of HR policy commitments: The company indicates that 'in 2018, 181 complete audits were conducted at our owned facilities, third-party contractor facilities and select raw material supplier facilities throughout Asia, Central America, the Caribbean Basin and North America. We completed 84% of our scheduled audits in 2018, with a number of audits postponed due to travel restrictions related to social unrest in several of our manufacturing locations. 112 of the completed audits were conducted by our internal auditors or by third-party auditors on our behalf, and 69 audits were conducted by external auditors mandated by the FLA, Better Work and WRAP or by customers'. [CSR Report 2018, 2019: genuineresponsibility.com] • Met: Monitoring AP suppliers: As indicated above, the Company monitors policy implementation in both own operations and supply chain through both internal auditors and third-party auditors. [CSR Report 2018, 2019: genuineresponsibility.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Score of 2 on A.1.2 • Met: Describes corrective action process: The Company indicates that there were 505 labour-related non-compliances in third-party contractor facilities (broken down by topic and severity) and 191 labour-related non-compliances in owned and dedicated facilities (broken down by topic and severity as well). It also explains the corrective action process followed for both own factories and third-party contractor: 'following an internal audit at a company-owned or third-party contractor facility, a management action plan (MAP) is developed and shared with the facility. Our regional social compliance teams work with facility managers to provide advice and recommendations on how best to address any issues, make changes where necessary and put in place sustainable remediation actions. Progress on the MAP is tracked through our Corporate Social Responsibility data platform. Facilities provide details and evidence of their corrective actions, which are subject to verification through follow-up audits. Facilities are expected to implement corrective actions and to demonstrate improvements within a prescribed timeframe. If a zero-tolerance issue occurs at our owned facilities, action plans will need to be established within one week; these will be reviewed and approved by senior management, and an exhaustive investigation would be conducted to confirm sustainable improvements'. [CSR Report 2018, 2019: genuineresponsibility.com] • Not met: Example of corrective action: Although the Company describes examples of non-compliances observed, no evidence found of example of corrective action carried out. [CSR Report 2018, 2019: genuineresponsibility.com] • Met: Discloses % of AP supply chain monitored: The company indicates that it 'audited 63% of actively producing third-party contractor facilities at least once in 2018'. [CSR Report 2018, 2019: genuineresponsibility.com] |
| B.1.7 | Engaging business relationships | 1.5 | <p>The individual elements of the assessment are met or not as follows: Score 1</p> <ul style="list-style-type: none"> • Met: HR affects AP selection of suppliers: The company indicates that 'before taking on new contractors, we fully evaluate their ability to comply with the principles of our Code of Conduct our quality standards and cost expectations. We do this through mandatory audits conducted either by our experienced internal auditors or in some instances by a third-party auditor. Internal teams assess the results and assign an audit rating to the facility which determines whether we will do business with them or not. If a potential contractor fails an initial audit, we may choose to re-audit them after a six-month period. The 2018 audit cycle included assessments of 21 potential third-party contractor facilities, two-thirds of which were unable to demonstrate adequate levels of compliance with our standards. Consequently, Gildan did not award business to these facilities'. [CSR Report 2018, 2019: genuineresponsibility.com] • Met: HR affects on-going AP supplier relationships: The Company also points out that in the context of a social compliance performance audition where there are compliance breaches, 'if a contractor facility is not able to demonstrate improvements within our prescribed timeframe, we reserve the right to terminate our relationship with them (...).During the course of 2018 the Company also exited |

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| | | | <p>an additional 9 existing third-party contractor facilities as part of an effort to consolidate and strengthen compliance within our supplier base'. [CSR Report 2018, 2019: genuineresponsibility.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Met: Both requirement under score 1 met • Not met: Working with AP suppliers to improve performance: The company describes that 'once we enter into a relationship with a third-party contractor, our regional social compliance teams work with contractors to educate and assist the development of sound labour practices, effective labour compliance management systems, policies and procedures, and implement remediation where required. Our contractors are regularly assessed for compliance'. However, no example of this work with suppliers found. [CSR Report 2018, 2019: genuineresponsibility.com] |
| 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"> • Not met: Stakeholder process or systems: The company indicates that 'One of the key areas we believe our stakeholders can help provide insight for us is in improving the lives of the people involved in manufacturing our products, ensuring an ethical and stimulating work environment and respecting and enhancing the local communities in which we operate. We invite groups representing workers, students, colleges, trade unions, academia, governments, local communities and consumers to communicate, share ideas and build consensus on these issues with us. This is done through a variety of methods, including face-to-face meetings, focus groups or roundtable sessions facilitated by external independent facilitators, workshops and seminars, confidential questionnaires and anonymous feedback'. However, it is not clear how the company has identified its affected stakeholders to then engage in particular issues. [CSR Report 2018, 2019: genuineresponsibility.com] • Met: Frequency and triggers for engagement: The company also discloses the frequency that it engages with each stakeholder and the concerns that may be raised during these engagements. For example, engagements with NGOs take place quarterly and the concerns raised may be 'employee wellbeing; labour rights; freedom of association; actions towards climate change'. In relation to triggers, the Company discloses the activities that lead to engagement, including audit requests, participation in roundtables, workshops, etc.. For employees, the triennial global employee engagement survey, the pulse surveys (made ad hoc), round tables (bimonthly), etc. [CSR Report 2018, 2019: genuineresponsibility.com] • Not met: Workers in AP SC engaged • Not met: Communities in the AP SC engaged: Although communities are engaged, it is not clear whether it includes communities in the supply chain, and human rights topics (engagement topics for communities include 'community development', 'education programs', and 'environment'. [CSR Report 2018, 2019: genuineresponsibility.com] <p>Score 2</p> <ul style="list-style-type: none"> • 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 | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Identifying risks in own operations: The Human rights policy indicates that 'the Company will take adequate measures to identify, prevent and mitigate risks or address adverse human rights impacts in connection with our operations'. It includes due diligence before establishing business relationships and compliance monitoring process. Moreover, the company indicates that 'we have updated our Social & Sustainable Compliance Guidebook, which now includes additional benchmarks and identified emerging risks, including migrant workers, modern slavery, and child labor, as well as updates reflecting the 2017 changes to our Code of Conduct'. However, it is not clear the process it follows to identify which are the human rights risk it faces across its activities in consultation with experts and affected stakeholders. [Human Rights Policy Statement, 05/2017: genuineresponsibility.com & CSR Report 2018, 2019: genuineresponsibility.com] • Not met: Identifying risks in AP suppliers <p>Score 2</p> <ul style="list-style-type: none"> • 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 |

| Indicator Code | Indicator name | Score (out of 2) | Explanation |
|----------------|---|------------------|---|
| B.2.2 | Assessing: Assessment of risks and impacts identified (salient risks and key industry risks) | 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"> • Not met: Salient risk assessment (and context): The company indicates that ‘during 2018, we updated our approach to auditing, adopting a risk-based approach, in which facilities are assessed based on the risk assessments that evaluate country risk, order volume, the facility’s rating and previous audit performance. (...) In 2018, 181 complete audits were conducted at our owned facilities, third-party contractor facilities and select raw material supplier facilities throughout Asia, Central America, the Caribbean Basin and North America’. Moreover, ‘we have updated our Social & Sustainable Compliance Guidebook, which now includes additional benchmarks and identified emerging risks, including migrant workers, modern slavery, and child labor’. However, it is not clear the process for assessing its human rights risks and what it considers to be its salient human rights issues. This process seems focused in the approach to audit, rather than to determine which are the actual risk that it faces (based, for instance, in factors like those mentioned). [CSR Report 2018, 2019: genuineresponsibility.com] • Not met: Public disclosure of salient risks: As it was seen above, it identified emerging risks, which included migrant workers, modern slavery, and child labor, however, it is not clear these are what the company considers to be its specific salient human rights issues. [CSR Report 2018, 2019: genuineresponsibility.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met |
| B.2.3 | Integrating and Acting: Integrating assessment findings internally and taking 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"> • Not met: Action Plans to mitigate risks: The company indicates that ‘during 2018, we updated our approach to auditing, adopting a risk-based approach, in which facilities are assessed based on the risk assessments that evaluate country risk, order volume, the facility’s rating and previous audit performance. (...) In 2018, 181 complete audits were conducted at our owned facilities, third-party contractor facilities and select raw material supplier facilities throughout Asia, Central America, the Caribbean Basin and North America’. However, no evidence found of a system to take action to prevent, mitigate or remediate its salient human rights issues. Current evidence seems to focus on how the Company decides which facilities audit, rather than how to tackle the human rights salient issues that it generally faces. [CSR Report 2018, 2019: genuineresponsibility.com] • Not met: Including in AP supply chain • Not met: Example of Actions decided <p>Score 2</p> <ul style="list-style-type: none"> • 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 | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: System to check if Actions are effective: The Company indicates that ‘following an internal audit at a company-owned or third-party contractor facility, a management action plan (MAP) is developed and shared with the facility. Our regional social compliance teams work with facility managers to provide advice and recommendations on how best to address any issues, make changes where necessary and put in place sustainable remediation actions. Progress on the MAP is tracked through our Corporate Social Responsibility data platform’. CHRB is looking for a description to the system for tracking the actions taken in response to human rights risks and impacts assessed and for evaluating whether the actions have been effective or have missed key issues or not produced the desired results. No further evidence found, as current evidence seems to correcting non-compliances, rather than assessing whether is approach to broadly mitigate salient human rights risks is working. [CSR Report 2018, 2019: genuineresponsibility.com] • Not met: Lessons learnt from checking effectiveness: The company indicates that ‘our teams use a root-cause analysis process to systematically identify the root cause of every major and moderate non-compliance raised during the audit process in order to prevent similar issues from reoccurring’. However, no example found of the lessons learned while tracking the effectiveness of its actions on at least one of its salient human rights issues as a result of the due diligence process. [CSR Report 2018, 2019: genuineresponsibility.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirement under score 1 met |
| B.2.5 | Communicating : Accounting for how human | 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"> • Not met: Comms plan re identifying risks • Not met: Comms plan re assessing risks • Not met: Comms plan re action plans for risks |

| Indicator Code | Indicator name | Score (out of 2) | Explanation |
|----------------|------------------------------|------------------|---|
| | rights impacts are addressed | | <ul style="list-style-type: none"> • Not met: Comms plan re reviewing action plans • Not met: Including AP suppliers Score 2 <ul style="list-style-type: none"> • 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 <ul style="list-style-type: none"> • Met: Channel accessible to all workers: The Code of ethics, which applies to all employees, describes different channels to file reports, including 'through the Ethics and Integrity Hotline'. [Code of Ethics: genuineresponsibility.com & Ethics and Compliance, 28/02/2019] Score 2 <ul style="list-style-type: none"> • Not met: Number grievances filed, addressed or resolved: The company indicates that 'in 2018, we received a total of 41 calls, the majority of which related to minor Human Resources issues, specifically labour issues and workplace conduct'. However, it is not clear that these are human rights related issues. [CSR Report 2018, 2019: genuineresponsibility.com] • Met: Channel is available in all appropriate languages: The company indicates that 'our confidential Integrity and Social Responsibility Hotline, administered by an independent third party, is available to all employees, suppliers and others in multiple languages to report any suspected misconduct in any area'. The 2017 also stated that 'the hotline is available 24 hours a day, seven days a week, enabling Gildan's stakeholders [explicitly including employees] to anonymously report concerns in any other language of their choice'. [CSR Report 2018, 2019: genuineresponsibility.com & Ethics and Compliance, 28/02/2019] • Met: Opens own system to AP supplier workers: The company indicates that 'our confidential Integrity and Social Responsibility Hotline, administered by an independent third party, is available to all employees, suppliers and others in multiple languages to report any suspected misconduct in any area'. [CSR Report 2018, 2019: genuineresponsibility.com] |
| C.2 | Grievance channel(s)/mechanism(s) to receive complaints or concerns from external individuals and communities | 1.5 | The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Grievance mechanism for community: The company indicates that 'our confidential Integrity and Social Responsibility Hotline, administered by an independent third party, is available to all employees, suppliers and others in multiple languages to report any suspected misconduct in any area'. [CSR Report 2018, 2019: genuineresponsibility.com & ethicspoint to report, 28/02/2019: secure.ethicspoint.eu] Score 2 <ul style="list-style-type: none"> • Met: Describes accessibility and local languages: See above, and indicator C.1. [CSR Report 2018, 2019: genuineresponsibility.com] • Not met: Expects AP supplier to have community grievance systems • Not met: AP supplier communities use global system: Although the Company indicates that it is open to stakeholders, no references found on whether suppliers' external stakeholders can use the channel to report concerns. No further evidence found. [CSR Report 2018, 2019: genuineresponsibility.com] |
| 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 <ul style="list-style-type: none"> • Not met: Engages users to create or assess system • Not met: Description of how they do this Score 2 <ul style="list-style-type: none"> • 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 |
| C.4 | Procedures related to the mechanism(s)/channel(s) are publicly available and explained | 0.5 | The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Response timescales: Although the EthicsPoint says that after 10 days people can use the report key and password to check the report, no further details given. It is not clear if this is the response timescale or the minimum period for the report to be processed. [ethicspoint to report, 28/02/2019: secure.ethicspoint.eu] • Met: How complainants will be informed: The EthicsPoint website says that 'you will be assigned a unique code called "report key"'. 'After 10 business days use your report key and password to check your report for feedback or questions'. [ethicspoint to report, 28/02/2019: secure.ethicspoint.eu] |

| Indicator Code | Indicator name | Score (out of 2) | Explanation |
|----------------|---|------------------|---|
| | | | <p>Score 2</p> <ul style="list-style-type: none"> Not met: Escalation to senior/independent level: The company indicates that 'complaints are reported on a quarterly basis to the Ethics and Compliance Committee, the Compliance Steering Committee, the Audit and Finance Committee of the Board of Directors, and the Chair of the Compensation and Human Resources Committee of the Board of Directors'. However, no evidence found on whether these complaints are escalated to these levels to be addressed. [CSR Report 2018, 2019: genuineresponsibility.com] |
| C.5 | Commitment to non-retaliation over complaints or concerns made | 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"> Met: Public statement prohibiting retaliation: The Code of ethics states that 'our company will not retaliate or tolerate retaliation against anyone who, in good faith, reports a possible violation of this Code, any of the Company's policies, or the law'. [Code of Ethics: genuineresponsibility.com] Met: Practical measures to prevent retaliation: The company indicates that 'we also offer options to report grievances anonymously at all of our administrative offices and manufacturing facilities, including through our Integrity and Social Responsibility Hotline and in suggestion boxes. In all cases, employees can report their grievances without fear of reprisals'. [CSR Report 2018, 2019: genuineresponsibility.com] <p>Score 2</p> <ul style="list-style-type: none"> Not met: Has not retaliated in practice Met: Expects AP suppliers to prohibit retaliation: Suppliers have access to the Company's own mechanisms. |
| C.6 | Company involvement with State-based judicial and non-judicial grievance mechanisms | 0 | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Not met: Won't impede state based mechanisms Not met: Complainants not asked to waive rights <p>Score 2</p> <ul style="list-style-type: none"> 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 | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Not met: Describes how remedy has been provided [CSR Report 2018, 2019: genuineresponsibility.com] Not met: Says how it would remedy key sector risks: The company indicates that 'following an internal audit at a company-owned or third-party contractor facility, a management action plan (MAP) is developed and shared with the facility. Our regional social compliance teams work with facility managers to provide advice and recommendations on how best to address any issues, make changes where necessary and put in place sustainable remediation actions. Progress on the MAP is tracked through our Corporate Social Responsibility data platform. Our teams use a root-cause analysis process to systematically identify the root cause of every major and moderate non-compliance raised during the audit process in order to prevent similar issues from reoccurring'. However, this is a broad description of the corrective (management) action plan, but no evidence found on the specific remedy actions, including not only supply chain. <p>Score 2</p> <ul style="list-style-type: none"> 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) | 0.5 | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Living wage target timeframe: The company indicates that 'in order to ensure that the salaries and total benefits offered to employees are sufficient to meet their basic needs, the Fair Labor Association (FLA) has developed a tool which will help to standardize the measurement of living wages at factories and comparable benchmarks. Gildan, as an active participating member of the FLA, has agreed to participate in these efforts, having tested the tool in 2018 in 48% of our facilities. By 2019, we expect that more than 70% of Gildan-owned manufacturing facilities will have been evaluated based on the FLA living wage methodology'. However, no evidence found of a target timeframe for paying all workers a living wage or that it has achieved paying the living wage. [CSR Report 2018, 2019: genuineresponsibility.com] • Met: Describes how living wage determined: The company indicates that 'in order to ensure that the salaries and total benefits offered to employees are sufficient to meet their basic needs, the Fair Labor Association (FLA) has developed a tool which will help to standardize the measurement of living wages at factories and comparable benchmarks. Gildan, as an active participating member of the FLA, has agreed to participate in these efforts (...). In addition, we conducted our own research throughout our manufacturing hubs to take into account inflation trends relating to food and housing amongst other factors(...).The participation of workers in the negotiation of Collective Bargaining Agreements in our unionized facilities has also played an important role in helping inform us of employees needs'. Several initiatives are listed by the company, such as Employee Cooperative and Grocery and Household Staples (an arrangement with a local store to provide employees with food and other household products at discounted prices). [CSR Report 2018, 2019: genuineresponsibility.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Achieved payment of living wage: The Company indicates that 'in all areas where our Company's manufacturing facilities are located, employees earn more than the legally-mandated minimum industry wages. We believe that employees have the right to a fair wage that is sufficient to cover basic needs and provide some level of discretionary income'. However, as indicated above, the Company is working in evaluating wages based on FLA methodology, and is not clear that it has achieved paying the living wage. [CSR Report 2018, 2019: genuineresponsibility.com] • Not met: Regularly review definition of living wage with unions |
| D.2.1.b | Living wage (in the supply chain) | 0 | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Living wage in supplier code or contracts: The code of conduct indicates that employees have the right to compensation that is 'sufficient to meet their basic needs and provide some discretionary income'. If compensation does not reach this level 'employers must take appropriate measures to gradually reach a satisfactory level'. Also, the company points out that 'we support the notion that where compensation does not meet employees' basic needs nor provide some discretionary income, employers must take appropriate measures to gradually reach a satisfactory compensation level'. However, a statement indicating that compensation should be enough for basic needs, family and discretionary income is needed. [Code of conduct: genuineresponsibility.com & Social and Sustainable Guidebook 2019, 2019: genuineresponsibility.com] • Not met: Improving living wage practices of suppliers <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met • Not met: Provide analysis of trends demonstrating progress |
| D.2.2 | Aligning purchasing decisions with human rights | 0 | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Avoids business model pressure on HRs: The company indicates that 'our sourcing and procurement practices are guided by the same Genuine Responsibility™ framework and aim to ensure respect for human rights, freedom of association and collective bargaining, and the prohibition of all forms of forced labour and child labour in the production of everything we sell. (...) We expect the same high social and environmental standards from both our owned and for contractor facilities. Our industry-leading Social Compliance Program encompasses both of these groups and includes a comprehensive program of audits'. However, it is not clear if the company adopts practices to avoid price or short notice requirements or other business considerations undermining human rights. [CSR Report 2018, 2019: genuineresponsibility.com] |

| Indicator Code | Indicator name | Score (out of 2) | Explanation |
|----------------|--|------------------|--|
| | | | <ul style="list-style-type: none"> • Not met: Positive incentives to respect human rights Score 2 <ul style="list-style-type: none"> • 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 <ul style="list-style-type: none"> • Not met: Identifies suppliers back to product source: The company discloses an interactive map in which appears 5 of its suppliers. It is not clear that the company identifies direct and indirect suppliers. Furthermore, no information found on how it goes about this. The Company also discloses information in relation to its own operations. However, this indicator is exclusively about supply chain. [Disclosed Locations - Web, 30/07/2019 & CSR Report 2018, 2019: genuineresponsibility.com] Score 2 <ul style="list-style-type: none"> • Not met: Discloses significant parts of supply chain and why: The company discloses an interactive map in which appears 5 of its suppliers, each of them with the name of the factory and an address provided. However, it is not clear if those are the most significant parts of its supply chain and why. [CSR Report 2018, 2019: genuineresponsibility.com & Disclosed Locations - Web, 30/07/2019] |
| D.2.4.a | Prohibition on child labour: Age verification and corrective actions (in own production or manufacturing operations) | 1 | The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Does not use child labour: The Company indicates in its code of conduct that it does not use child labour. [Code of Ethics: genuineresponsibility.com & Code of conduct: genuineresponsibility.com] • Met: Age verification of job applicants and workers: The company indicates that 'Employers must require "proof of age" at time of hire, where allowed by law, which may include birth certificate, family book, personal registration (ID) card, driver's license and voting registration card. Copies of these documents must be kept in the employee's personnel file throughout the term of employment'. [Social and Sustainable Guidebook 2019, 2019: genuineresponsibility.com] Score 2 <ul style="list-style-type: none"> • Not met: Remediation if children identified: Employers shall establish, document, maintain, and effectively communicate to personnel and other interested parties, policies and written procedures for remediation of children found to be working in situations which fit the definition of child labor. These employers shall provide adequate financial and other support to enable such children to attend and remain in school until no longer a child. However, this describes a procedure to be followed, and this sub indicator looks for evidence of actual development, participation or contribution to programmes that helps suppliers to prevent child labour impact. [Social and Sustainable Guidebook 2019, 2019: genuineresponsibility.com] |
| D.2.4.b | Prohibition on child labour: Age verification and corrective actions (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"> • Met: Child Labour rules in codes or contracts: In the Code of conduct it is stated that "employees must be at least 16 years of age or over the age for completion of compulsory education or the country legal working age, whichever is higher." It applies for the company itself and for its suppliers. However, no evidence found on age verification and remediation programs in case child labour is found in its contractual arrangements with suppliers or in its Supplier Code of Conduct. The company's Social and Sustainable Compliance Guidebook there are guidelines for age proofing and child labour remediation. In relation to the latest, it says: 'Employers shall establish, document, maintain, and effectively communicate to personnel and other interested parties, policies and written procedures for remediation of children found to be working in situations which fit the definition of child labor. These employers shall provide adequate financial and other support to enable such children to attend and remain in school until no longer a child'. [Code of Conduct: genuineresponsibility.com & Social and Sustainable Guidebook 2019, 2019: genuineresponsibility.com] • Not met: How working with suppliers on child labour: The company indicates that 'In Nicaragua, we support the continued education of our employees' children by distributing more than 6,704 back-to-school kits'. However, no evidence found on how the company works with suppliers to eliminate child labour and to improve working conditions for young workers where relevant. [CSR Report 2018, 2019: genuineresponsibility.com] Score 2 <ul style="list-style-type: none"> • 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.2.5.a | Prohibition on forced labour: Debt bondage and other unacceptable financial costs (in own production or manufacturing operations) | 0 | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Not met: Pays workers in full and on time: The Company indicates in the Code of conduct that employees have the right to compensation for a regular work week (wage). Also, that 'our sourcing and procurement practices are guided by the same Genuine responsibility framework and aim to ensure respect for human rights, freedom of association and collective bargaining, and the prohibition of all forms of forced labour and child labour in the production of everything we sell'. Moreover, it states, in its Social and Sustainable Compliance Guidebook, that 'Gildan and its business partners will not use forced labor, including prison labor, indentured labor, bonded labor or any other form of forced labor'. However, no evidence found that it pays workers regularly, in full and on time and (although it does require employers not require to workers pay work related fees or costs). [Code of conduct: genuineresponsibility.com & CSR Report 2018, 2019: genuineresponsibility.com] Not met: Payslips show any legitimate deductions: No evidence found that all workers receive a payslip with their wages explaining any legitimate deductions. [CSR Report 2018, 2019: genuineresponsibility.com & Social and Sustainable Guidebook 2019, 2019: genuineresponsibility.com] <p>Score 2</p> <ul style="list-style-type: none"> 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) | 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"> Met: Debt and fees rules in codes or contracts: The company indicates that 'Our sourcing and procurement practices are guided by the same Genuine Responsibility™ framework and aim to ensure respect for human rights, freedom of association and collective bargaining, and the prohibition of all forms of forced labour and child labour in the production of everything we sell'. In its Social and Sustainable Compliance Guidebook, the company gives guidelines on bonded labour: 'Employers shall not utilize practices that restrict workers freedom of movement or ability to terminate his or her employment. Examples of such practices include [...] requiring deposits; imposing financial penalties; requiring recruitment fees'. [Social and Sustainable Guidebook 2019, 2019: genuineresponsibility.com & CSR Report 2018, 2019: genuineresponsibility.com] Not met: How working with suppliers on debt & fees <p>Score 2</p> <ul style="list-style-type: none"> 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) | 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"> Met: Does not retain documents or restrict movement: In its Social and Sustainable Compliance Guidebook, the company has a number of requirement sin relation to forced labour restricting worker movement: 'Employers shall not require workers to live in employer-owned/controlled residences as a condition of recruitment, continued employment or to receive the same terms of employment and working conditions as other workers in the same position. Employers shall not subject workers to any undue influence to persuade workers to live in such residences'; 'Denying and hampering access to, and renewal of identity papers and/or work permits or any other personal legal (identification) documents'. [Social and Sustainable Guidebook 2019, 2019: genuineresponsibility.com] <p>Score 2</p> <ul style="list-style-type: none"> Not met: How sure about agencies or brokers |
| D.2.5.d | Prohibition on forced labour: Restrictions on workers (in the supply chain) | 1 | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Met: Free movement rules in codes or contracts: In its Code of Conduct, the company states that 'Gildan and its business partners will not use forced labour, including prison labour, indentured labour, bonded labour or any other form of forced labour'. Moreover, in its Social and Sustainable Compliance Guidebook it indicates that 'if workplace entrances are locked or guarded to prevent nonemployee access to the premises for security reasons, workers shall have free egress at all times, subject to work rules. No employment term shall confine or restrict employees' freedom of movement. Access to bathroom facilities or fresh drinking water shall not be controlled, restricted or limited'. Also, 'workers shall retain possession or control of their passports, identity papers, travel documents, and other personal legal documents. Employers may obtain only copies of original documents for employment record-keeping purposes'. [Social and Sustainable Guidebook 2019, 2019: genuineresponsibility.com] |

| Indicator Code | Indicator name | Score (out of 2) | Explanation |
|----------------|--|------------------|---|
| | | | <ul style="list-style-type: none"> • Not met: How these practices are implemented and monitored for agencies, labour brokers or recruiters Score 2 <ul style="list-style-type: none"> • 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) | 2 | The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Commits not to interfere with union rights and collective bargaining and prohibits intimidation and retaliation: Although there is a commitment to respect freedom of association and the right to collective bargaining, no evidence found of commitment to not interfere with these rights and measures in place to prohibit intimidation and retaliation against workers seeking to exercise these rights. Moreover, in its Social and Sustainable Compliance Guidebook, the company discloses anti-union discrimination and protection of union representatives' guidelines. [Code of conduct: genuineresponsibility.com & Social and Sustainable Guidebook 2019, 2019: genuineresponsibility.com] • Met: Discloses % covered by collective bargaining: The company indicates that 'we fundamentally respect our employees' rights to form or join any organization or association of their choosing, including unions. We also respect their rights to engage in collective bargaining with us. Around 55% (28,332) of our global employees are currently covered by a collective bargaining agreement in place between unions and corresponding facilities'. [CSR Report 2018, 2019: genuineresponsibility.com] Score 2 <ul style="list-style-type: none"> • Met: Both requirement under score 1 met: See above |
| D.2.6.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 <ul style="list-style-type: none"> • Met: FoA & CB rules in codes or contracts: The Company indicates that 'Gildan and its business partners will recognize and respect the right of employees to Freedom of Association and Collective Bargaining'. Moreover, in its Social and Sustainable Compliance Guidebook, the company discloses anti-union discrimination and protection of union representatives' guidelines and requirements: 'Employers shall not engage in any acts of anti-union discrimination or retaliation...'. [Code of conduct: genuineresponsibility.com & Social and Sustainable Guidebook 2019, 2019: genuineresponsibility.com] Score 2 <ul style="list-style-type: none"> • Not met: How working with suppliers on FoA and CB • Not met: Both requirements under score 1 met • Not met: Provide analysis of trends in progress made |
| D.2.7.a | Health and safety: Fatalities, lost days, injury rates (in own production of manufacturing operations) | 0.5 | The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Injury Rate disclosures: The Company indicates that 'in 2018 our work-related injury rate was 0.44'. [CSR Report 2018, 2019: genuineresponsibility.com] • Met: Lost days or near miss disclosure: It also discloses that 'we also had fewer days away from work (0.15 versus 0.5 for the industry)'. [CSR Report 2018, 2019: genuineresponsibility.com] Score 2 <ul style="list-style-type: none"> • Not met: Fatalities disclosures: The company indicates it had zero fatalities in 2018. [CSR Report 2018, 2019: genuineresponsibility.com] • Not met: Set targets for H&S performance • Met: Met targets or explains why not: The Company indicates that 'for fiscal year 2017, one of our objectives was to improve our global safety rates by 10%. When compared with the 2016 results, we can see that the objective was met on the severity rate (31.4%) decrease and partially met on the work-related injury rate (5.5%). Moreover, the company indicates that 'the slight increase this year relates mainly to the rise in the number of injuries in some of our distribution centers following organizational changes in these locations. We will work hard in 2019 to ensure we stay on our long term track of improvement in our health and safety performance'. It went from 2,14 in 2017 to 2.5 in 2018. However, it is not clear what the company's health targets were, hence if they were met or not. [Sustainability Report 2017, 2018: genuineresponsibility.com & CSR Report 2018, 2019: genuineresponsibility.com] |

| Indicator Code | Indicator name | Score (out of 2) | Explanation |
|----------------|---|------------------|---|
| D.2.7.b | Health and safety: Fatalities, lost days, injury rates (in the supply chain) | 0.5 | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Sets out clear Health and Safety requirements: The company indicates in its Code of Conduct that 'Gildan and its business partners will take all necessary measure to provide a safe and healthy workplace setting to prevent accidents and illnesses arising out of, linked with, or occurring in the course of work or as a result of the operation of employers' facilities and other locations'. Then, it discloses health and safety guidelines in its Social and Sustainable Compliance Guidebook. [Social and Sustainable Guidebook 2019, 2019: genuineresponsibility.com] • Not met: Injury rate disclosures • Not met: Lost days or near miss disclosures • Not met: Fatalities disclosures <p>Score 2</p> <ul style="list-style-type: none"> • 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) | 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"> • Not met: Process to stop harassment and violence: The company indicates that 'Gildan and its business partners will treat every employee with respect and dignity. No employee shall be subject to any physical, sexual, psychological, or verbal harassment or abuse'. However, it is not clear its processes to prohibit harassment, intimidation and violence against women'. In its Diversity & Inclusion Policy there are guidelines to prevent harassment or abuse, and sexual harassment. It is not clear the processes to prohibit harassment, intimidation and violence against women in specific. [Social and Sustainable Guidebook 2019, 2019: genuineresponsibility.com] • Not met: Working conditions take account of gender • Met: Equality of opportunity at all levels: The company indicates that 'we have implemented programs that provide women with training, networking opportunities and resources to help them build their personal toolkit for success. In 2018, we increased the percentage of women in top management positions by 5.5%. (...) As part of our overall commitment to diversity and inclusion, we want to break down the barriers for women to be successful in the workplace and help them to develop leadership skills that will serve them well in their personal and professional lives'. Also, in its Diversity & Inclusion Policy, the company indicates that 'Gildan is committed to foster, cultivate and preserve a culture of diversity and inclusion. (...) In order to continuously assess the effectiveness of this Policy, including its impact, the Human Resources Department will monitor the following performance indicators: representation of women and minorities in our overall workforce, as well as in leadership roles; percentage that women and minorities represent of new hires and internal promotions; percentage of women and minorities identified as high potential and successors'. [Diversity and inclusion policy, 07/2016 & CSR Report 2018, 2019: genuineresponsibility.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Meets all of the requirements under score 1: In relation to women empowerment at work, the Company describes its "women's empowerment program", the "international women's day", the "taking the stage" and a partnership with a non-profit that works to accelerate progress for women through workplace inclusion. The Company also disclose some indicators on diversity. However, no specific found in relation to the three requirements above. [CSR Report 2018, 2019: genuineresponsibility.com & Diversity and inclusion policy, 07/2016] |
| D.2.8.b | Women's rights (in the supply chain) | 0 | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Women's rights in codes or contracts: The company indicates that 'Gildan and its business partners will treat every employee with respect and dignity. No employee shall be subject to any physical, sexual, psychological, or verbal harassment or abuse'. However, no women's rights requirements found, including the provision of equal pay for equal work, and measures to ensure equal opportunities throughout all levels of employment and to eliminate health and safety concerns that are particularly prevalent among women workers, in its contractual arrangements with its suppliers or in its supplier code of conduct. [Social and Sustainable Guidebook 2019, 2019: genuineresponsibility.com] • Not met: How working with suppliers on women's rights <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirement under score 1 met • Not met: Provide analysis of trends in progress made |

| Indicator Code | Indicator name | Score (out of 2) | Explanation |
|----------------|---|------------------|--|
| D.2.9.a | Working hours (in own production or manufacturing operations) | 1 | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Respects max hours, min breaks and rest periods in its own operations: The code of conduct states that 'employees must not be required to work more than a total of 60 hours per week or the regular overtime hours allowed by the law of the country, whichever is less. The regular work week shall not exceed 48 hours. Employees must be allowed at least 24 consecutive hours in every seven-day period'. [Code of conduct: genuineresponsibility.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: How it implements and checks this: In its Social and Sustainable Compliance Guidebook, the company describes how maximum overtime, rest breaks, rest day, annual and sick leave should be dealt with in its own facilities. However, it is not clear how it actually checks and implements these practices. [Social and Sustainable Guidebook 2019, 2019: genuineresponsibility.com] |
| D.2.9.b | Working hours (in the supply chain) | 1 | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Working hours in codes or contracts: The company indicates that 'employees must not be required to work more than a total of 60 hours per week or the regular and overtime hours allowed by the law of the country, whichever is less. The regular work week shall not exceed 48 hours. Employees must be allowed at least 24 consecutive hours of rest in every seven-day period. All overtime work shall be consensual. Employers shall not request overtime on a regular basis and shall compensate all overtime work at a premium rate'. [Code of conduct: genuineresponsibility.com] • Not met: How working with suppliers on working hours <p>Score 2</p> <ul style="list-style-type: none"> • 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 | | <ul style="list-style-type: none"> • Headline: SitraStar union treasurer renounces post following death threats at Star factory in Honduras • Area: FoA & CB • Story: Resumen Latinoamericano has claimed in February 2018 that Lino Hernandez, leader of the SitraStar union, which represents employees of the Star maquila belonging to Gildan, resigned from his job and the union over alleged death threats and intimidation to him and his family. Lino Hernández has fought for labor rights and negotiation of the collective bargaining agreement. The Company responded by not mentioning the reasons of his resignation. <p>Additionally, in November 2018, IndustriALL uncovered that a Gildan's supplier in Haiti unfairly dismissed union leaders and activists. The Company claimed that the allegations described are 'inaccurate'.</p> <ul style="list-style-type: none"> • Sources: [Business & Human Rights Resource Centre, 06/03/18: business-humanrights.org] <p>][Resumen Latinoamericano, 21/02/18: resumenlatinoamericano.org][industriAll, 07/11/18: industrialunion.org]</p> |
| E(1).1 | The Company has responded publicly to the allegation | 2 | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Public response available: The Company has publicly responded to allegations in writing, saying that "I would like to thank you for the opportunity to provide facts and further clarify the situation regarding the Facebook post and the blog article [...]. In both of the situations the allegations as presented are inaccurate." [Response to Business and Human Rights Centre, March 2018: business-humanrights.org & Response to Business and Human Rights Centre, November 2018: business-humanrights.org] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Response goes into detail: The Company describes the details of the allegations stating that "Regarding allegations pertaining to the IndustriALL article, we can state the following: The first part of the article involved a group of employees who were laid off as a result of seasonal fluctuations in production levels at our Mayan Textile facility, on Sept 29th, 2018. At the time of the dismissals, Gilda had not yet received notification of the existence of the SitraGilmas union, nor of any members thereof. The employees themselves acknowledged this failure to notify the Company prior to the Sept 29th dismissals |

| Indicator Code | Indicator name | Score (out of 2) | Explanation |
|----------------|---|------------------|--|
| | | | <p>during meetings held on September 30th and October 1st between Gilda and union representatives. During these meetings, Gilda agreed to reinstate all employees included in the union registration upon receipt of a confirmation letter from the Labor Ministry addressing the formation of the union, which was received at the end of October, nearly 30 days after the initial dismissals had occurred. The IndustriAll article also included allegations regarding dismissals in Haiti at a sewing contractor engaged by Gilda, which occurred at a time when there was wide-spread national unrest in the country. The unrest was largely related to unresolved election results that prevented the annual revision to the country's minimum wage. Gilda was notified of the dismissals after they occurred and our contractor indicated at the time that the individuals had been dismissed for attempting to disrupt production in the facility after it had reopened. Gilda has been working with the contractor and other stakeholders to address the situation. To our knowledge, at this time almost all of the workers' situations have been remediated. We will continue to ensure that all contractors align with the principles of our Code of Conduct, including the rights of all workers to form unions and collectively bargain". [Response to Business and Human Rights Centre, March 2018: business-humanrights.org & Response to Business and Human Rights Centre, November 2018: business-humanrights.org]</p> |
| E(1).2 | The Company has appropriate policies in place | 1 | <p>The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Company policies address the general issues raised: The Code of Conduct requires both employees and business partners to adhere to it. It includes the following issues: child labour, forced labour, compensation, hours of work/overtime, health and safety, environment, freedom of association, collective bargaining, harassment or abuse, grievance procedures as well as non-discrimination. [Code of conduct: genuineresponsibility.com] • Met: Policies apply to the type of business relationships involved: The Code of Conduct requires both employees and business partners to adhere to it. [Code of conduct: genuineresponsibility.com] Score 2 <ul style="list-style-type: none"> • Not met: Policies address the specific rights in question: In Gildan Activewear's Social and Sustainable compliance guide the company says "Employers shall not use any form of physical or psychological violence, threats, intimidation, retaliation, harassment or abuse against union representatives and workers seeking to form or join an organization of their own choosing. Such practices shall not be used against workers' organizations or workers participating or intending to participate in union activities, including strikes". However there is no further detail about the measures put in place to prevent this retaliation or intimidation. [Social and Sustainable Guidebook 2019, 2019: genuineresponsibility.com] </p> |
| E(1).3 | The Company has taken appropriate action | 0.5 | <p>The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Engages with affected stakeholders: The Company states that "Gildan has been working with the contractor and other stakeholders to address the situation." [Response to Business and Human Rights Centre, November 2018: business-humanrights.org] • Met: Encourages linked business to engage affected stakeholders: See above. [Response to Business and Human Rights Centre, November 2018: business-humanrights.org] • Not met: Provides remedies to affected stakeholders: The Company describes that 'To our knowledge, at this time almost all of the workers' situations have been remediated. We will continue to ensure that all contractors align with the principles of our Code of Conduct, including the rights of all workers to form unions and collectively bargain.' However, it is not clear what kind of remedy has been provided. [Response to Business and Human Rights Centre, November 2018: business-humanrights.org] • Not met: Has reviewed management systems to prevent recurrence: CHRB did not find evidence of the Company reviewing the system followed by the case. Score 2 <ul style="list-style-type: none"> • Not met: Remedies are satisfactory to the victims • Not met: Has improved systems and engaged affected stakeholders: CHRB did not find evidence of the Company improving the system or engaging with stakeholders followed by the case. </p> |

F. Transparency (10% of Total)

| Indicator Code | Indicator name | Score | Explanation |
|----------------|--|--------------|--|
| F.1 | Company willingness to publish information | 2.5 out of 4 | Out of a total of 48 indicators assessed under sections A-D of the benchmark, Gildan Activewear made data public that met one or more elements of the methodology in 30 cases, leading to a disclosure score of 2.5 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 <ul style="list-style-type: none"> • Met: Company reports on GRI: The Company provides a GRI index containing the information of the sustainability report. [CSR Report 2018, 2019: genuineresponsibility.com] |
| F.3 | Key, High Quality Disclosures | 0 out of 4 | Gildan Activewear 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 <ul style="list-style-type: none"> • 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 <ul style="list-style-type: none"> • 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 <ul style="list-style-type: none"> • 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) |

Disclaimer

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

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

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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.