

## Corporate Human Rights Benchmark 2018 Company Scoresheet



**Company Name** Hanesbrands  
**Industry** Apparel (Supply Chain and Own Operations)  
**Overall Score (\*)** 46.8 out of 100

Theme Score	Out of	For Theme
5.8	10	A. Governance and Policies
8.2	25	B. Embedding Respect and Human Rights Due Diligence
9.6	15	C. Remedies and Grievance Mechanisms
10.1	20	D. Performance: Company Human Rights Practices
9.4	20	E. Performance: Responses to Serious Allegations
3.6	10	F. Transparency

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

Please note also that the "Not met" labels in the Explanation boxes below do not necessarily mean that the company does not meet the requirements as they are described in the bullet point short text. Rather, it means that the analysts could not find information *in public sources* that met the requirements *as described in full* in the CHRB 2018 Methodology document. For example, a "Not met" under "General HRs Commitment", which is the first bullet point for indicator A.1.1, does not necessarily mean that the company does not have a general commitment to human rights. Rather, it means that the CHRB could not identify a public statement of policy in which the company commits to respecting human rights.

### Detailed assessment

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

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1.1	Commitment to respect human rights	1	The individual elements of the assessment are met or not as follows: Score 1 • Met: General HRs commitment: In the document Global Human Rights Policy, the Company states 'Respect for human rights is fundamental to who we are at Hanes Brands. We are committed to ensuring that all people are treated with dignity and respect, and we are committed to providing certain fundamental rights at work so that all those working for us have the opportunity to fully achieve their human potential. In developing our Human Rights Policy, Hanes Brands was informed by the International Bill of Human Rights, the International Labour Organization's Declaration on Fundamental Principles and Rights at Work, and the United Nations Guiding Principles on Business and Human Rights.' [Global Human Rights Policy, 03/05/2018: <a href="https://hanesforgood.com">hanesforgood.com</a> ] Score 2 • Not met: UNGPs: In its Global Human Rights Policy, the Company states that the development of its policy was informed by the UN Guiding Principles on Business and Human Rights, but it does not specify a formal commitment. [Global Human Rights Policy, 03/05/2018: <a href="https://hanesforgood.com">hanesforgood.com</a> ]
A.1.2	Commitment to respect the human rights of workers	1.5	The individual elements of the assessment are met or not as follows: Score 1 • Met: ILO Core: The Company's Global Human Rights policy states that it supports all four ILO standards [Global Human Rights Policy, 03/05/2018: <a href="https://hanesforgood.com">hanesforgood.com</a> ]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Met: All four ILO for AP suppliers: The requirements are outlined in the Global Standards for Suppliers, requiring suppliers to sign to state that its Employment Practices support all four ILO standards. [Global Standards for Suppliers, 03/05/2018] Score 2</li> <li>• Met: All four ILO Core: The Global Human Rights policy includes an explicit commitment to each ILO core area. [Global Human Rights Policy, 03/05/2018: <a href="http://hanesforgood.com">hanesforgood.com</a>]</li> <li>• Met: Respect H&amp;S of workers: The Global Human Rights Policy states that 'Hanesbrands is committed to providing a safe and healthy workplace and complying with applicable safety and health laws, regulations and our own internal requirements.' [Global Human Rights Policy, 03/05/2018: <a href="http://hanesforgood.com">hanesforgood.com</a>]</li> <li>• Met: H&amp;S applies to AP suppliers</li> <li>• Not met: working hours for employees</li> <li>• Met: Working hours for AP suppliers: The Global Standard for suppliers states 'Suppliers will comply with all applicable laws and regulations regarding working hours.' [Global Standards for Suppliers, 03/05/2018]</li> </ul>
A.1.3.AP	Commitment to respect human rights particularly relevant to the industry (AP)	0.5	<p>The individual elements of the assessment are met or not as follows: Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Women's Rights: Hanesbrands states in its Response to CHRB Company Assessment that 'is fully committed to respecting women's rights' and 'Hanesbrands also seeks to protect women's rights in the workplace through its Supplier Scorecard, which audits owned and supplier facilities around the world on such things as clean and separate restroom facilities, clean and separate dormitory sleeping rooms, zero tolerance for sexual abuse and other forms of discrimination'. Regarding the right to water, Hanesbrands states in the same document that 'The company respects the right to water and sanitation and seeks to improve the quality of life in its communities by improving the environment that sustains us' and 'the company requires its global supplier facilities to provide employees unrestricted access to drinking water, responsibly limit and manage wastewater discharges, water usage, and wastewater treatment, provide water that meets drinking quality standards, as verified by a 3rd party lab, and provide appropriate hand-washing facilities with potable water'. However, there is no formal policy document containing this information. [Submission to the CHRB Disclosure Platform: 'Response to CHRB', 28/03/2018: <a href="http://business-humanrights.org">business-humanrights.org</a>]</li> <li>• Not met: Children's Rights</li> <li>• Not met: Migrant worker's rights</li> <li>• Not met: Expecting suppliers to respect these rights</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: CEDAW/Women's Empowerment Principles</li> <li>• Not met: Child Rights Convention/Business principles</li> <li>• Not met: Convention on migrant workers</li> <li>• Met: Respecting the right to water</li> <li>• Not met: Expecting suppliers to respect these rights</li> </ul>
A.1.4	Commitment to engage with stakeholders	0	<p>The individual elements of the assessment are met or not as follows: Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Commits to stakeholder engagement: The Company communicates through the Responses to Corporate Human Rights Benchmark document that 'has had a long history of engaging directly with a range of stakeholders, an implicit requirement of Fair Labour Association membership to which we are bound' and 'We meet or talk regularly on a range of issues with the Fair Labour Association, Workers Rights Consortium ("WRC"), Maquiladora Solidarity Network, the America's Group, representatives of the International Labour Organization Better Work programs globally, local members of the non-governmental organization community and labour organizations'. In their Human Rights Policy, the Company states that it 'engages with stakeholders to ensure we are listening to, learning from and taking into account their views on human rights issues. We are especially committed to engaging in appropriate dialogue with stakeholders on our human rights program.' However, it is not clear whether this engagement covers potentially and actually affected stakeholders. [Submission to the CHRB Disclosure Platform: 'Response to CHRB', 28/03/2018: <a href="http://business-humanrights.org">business-humanrights.org</a> &amp; Global Human Rights Policy, 03/05/2018: <a href="http://hanesforgood.com">hanesforgood.com</a>]</li> <li>• Not met: Regular stakeholder engagement</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Commits to engage stakeholders in design</li> <li>• Not met: Regular stakeholder design engagement</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1.5	Commitment to remedy	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Commits to remedy: The Company states in their human rights policy "Hanesbrands respects human rights, and we are committed to identifying, preventing, and remediating adverse human rights impacts that results from or are caused by our business activities." The Company also discloses that "we are committed to investigating, addressing and responding to any such issues raised and to taking appropriate corrective action in response to any violation of this policy." [Global Human Rights Policy, 03/05/2018: <a href="https://www.hanesforgood.com">hanesforgood.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Not obstructing access to other remedies: The Company communicates in it's Human Rights Policy that "we have not and will not impede state-based judicial or non-judicial actions in favour of persons making allegations of adverse human rights actions and have not and will not require anyone to waive legal rights as a condition of participating in our grievance process." [Global Human Rights Policy, 03/05/2018: <a href="https://www.hanesforgood.com">hanesforgood.com</a>]</li> <li>• Not met: Collaborating with other remedy initiatives</li> <li>• Not met: Work with AP suppliers to remedy impacts</li> </ul>
A.1.6	Commitment to respect the rights of human rights defenders	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Zero tolerance attacks on HRs Defenders (HRDs): The Global Human Rights Policy states "we do not tolerate any threats, intimidation, or legal actions against human rights defenders, and we expect the same of our suppliers." [Global Human Rights Policy, 03/05/2018: <a href="https://www.hanesforgood.com">hanesforgood.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Expects AP suppliers to reflect company HRD commitments: As above. [Global Human Rights Policy, 03/05/2018: <a href="https://www.hanesforgood.com">hanesforgood.com</a>]</li> </ul>

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.2.1	Commitment from the top	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: CEO or Board approves policy: The Company communicates in its Responses to Corporate Human Rights Benchmark document that its Global Code of Conduct and its Global Standards for Suppliers 'are reviewed and approved at our board level and our audit committee oversees and is given regular updates throughout the year on the progress of our human rights initiatives and the trend data generated from our scorecard audit process'. [Submission to the CHRB Disclosure Platform: 'Response to CHRB', 28/03/2018: <a href="https://www.business-humanrights.org">business-humanrights.org</a>]</li> <li>• Met: Board level responsibility for HRs</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Speeches/letters by Board members or CEO: The same document discloses that in May 2016, the Chairman of the Board spoke at the event where the Company was honoured for its 'community development and human rights work'. [Submission to the CHRB Disclosure Platform: 'Response to CHRB', 28/03/2018: <a href="https://www.business-humanrights.org">business-humanrights.org</a>]</li> </ul>
A.2.2	Board discussions	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Board/Committee review of salient HRs: The Company states In their 2018 CHRB Disclosure Form that 'Our Global Code of Conduct, Global Standards for Suppliers and human rights policies and program are overseen and reviewed at our board level. Our Audit Committee oversees the program and is given regular updates throughout the year on the progress of our human rights initiatives.' [Submission to the CHRB Disclosure Platform: 'Response to CHRB', 28/03/2018: <a href="https://www.business-humanrights.org">business-humanrights.org</a>]</li> <li>• Met: Examples or trends re HR discussion: The Company states In their 2018 CHRB Disclosure Form that 'The updates include the trend data generated from our scorecard audit process. In 2016, we were honoured by Glasswing International for our community development and human rights work in conjunction with Glasswing and USAid. The Chairman of our Board spoke at that event on the importance of human rights to us. He also spoke recently on the importance of human rights when receiving the award as Responsible CEO of the Year by CR Magazine. We firmly believe that respecting human rights is the right way to run a business and is a business imperative.' [Submission to the CHRB Disclosure Platform: 'Response to CHRB', 28/03/2018: <a href="https://www.business-humanrights.org">business-humanrights.org</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Both examples and process: As above.</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.2.3	Incentives and performance management	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Incentives for at least one board member</li> <li>• Not met: At least one key AP HR risk, beyond employee H&amp;S</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Performance criteria made public</li> </ul>

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

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.1	Responsibility and resources for day-to-day human rights functions	2	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Met: Senior responsibility fo HR (inc ILO): The Company states on its website that 'our Vice President, Corporate Social Responsibility, formally manages our social responsibility and environmental compliance programs. He is responsible for ensuring organizational alignment and managing our social and environmental partnerships and business partner communications. He leads a department comprising a worldwide network of more than 15 internal corporate social responsibility employees based in the United States, Latin America and Asia. This team is responsible for developing and overseeing the Global Ethics and Compliance program' and 'oversight of the program at the executive level rests with our Chief Legal Officer, as well as a Corporate Social Responsibility executive steering committee (our Chief Executive Officer and his direct reports) that meets three times a year to assess the program's effectiveness. Day-to-day responsibility for our Corporate Social Responsibility program rests with our vice president of corporate social responsibility'. The Responses to Corporate Human Rights Benchmark document discloses that the Vice President of Corporate Social Responsibility 'works very closely with the President Global Supply Chain and his direct team who oversee our internal manufacturing and product sourcing operations. The Vice President of Corporate Social Responsibility sits in the President Global Supply Chain's weekly staff meetings and discusses human rights and other issues in real time with him and his entire team and provides quarterly updates of key issues and trend data generated from our scorecard audit process'. The Company is committed to each ILO core areas in its policies for both owned operations and suppliers.</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Met: Day-to-day responsibility: The Hanesbrands human rights program is overseen by the Vice President of Corporate Social Responsibility, who reports directly to the company's Chief Administrative Officer, General Counsel and Corporate Secretary. He also works very closely with the President Global Supply Chain and his direct team who oversee our internal manufacturing and product sourcing operations. The VP CSR sits in the President Global Supply Chain's weekly staff meetings and discusses human rights and other issues in real time with him and his entire team and provides quarterly updates of key issues and trend data generated from our scorecard audit process. In addition, the VP of Corporate Social Responsibility provides quarterly reporting to a CSR committee composed of, among others, the Chief Executive Officer and his senior executive team. This organization structure was designed to embed the respect for human rights throughout our organization – and to have both senior-level oversight and day-to-day engagement in our human rights program.</li> <li>• Met: Day-to-day responsibility in supply chain: See above</li> </ul>
B.1.2	Incentives and performance management	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Senior manager incentives for human rights: CHRB has not identified any documents in the public domain which provide all the information required to meet this indicator.</li> <li>• Not met: At least one key AP HR risk, beyond employee H&amp;S</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Performance criteria made public</li> </ul>
B.1.3	Integration with enterprise risk management	2	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Met: HR part of enterprise risk system: The Company describes in the Annual Report its risk factors, among them violation of 'local or international labour laws' and engagement 'in labour or other practices that would be viewed in any market in which our products are sold as unethical', as well as changes in laws including 'wage and hour laws and regulations, fair labour standards, minimum wage</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>requirements, overtime pay'. On its website, the Company states that 'Hanesbrands realizes that forced labour and human trafficking can occur in many forms – such as child labour, workplace harassment, workplace abuse, and workplace discrimination'. The Responses to Corporate Human Rights Benchmark document discloses that 'Hanesbrands has an extensive Enterprise Risk Management process that considers human rights related risks as part of its work. The leadership team charged with oversight of the Enterprise Risk Management process meets regularly with the Vice President of Corporate Social Responsibility and others to discuss those risks. There is a specific section in the Enterprise Risk Management document reviewed with the Audit Committee of the Board that is dedicated to human rights risks and updated several times each year'.</p> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Audit Ctte or independent risk assessment</li> </ul>
B.1.4.a	Communication /dissemination of policy commitment(s) within Company's own operations	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Communicates its policy to all workers in own operations: CHRB has not identified any documents in the public domain which provide all the information required to meet this indicator.</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Communication of policy commitments to stakeholder</li> <li>• Not met: How policy commitments are made accessible to audience</li> </ul>
B.1.4.b	Communication /dissemination of policy commitment(s) to business relationships	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Steps to communicate policy commitments to BRs: The Responses to Corporate Human Rights Benchmark document discloses that 'our Global Standards for Suppliers are provided to all suppliers who are contractually bound to abide by them and the Fair Labour Association guidelines'. However, it is not clear how the Company suppliers then cascade this commitment down their supply chain. [Submission to the CHRB Disclosure Platform: 'Response to CHRB', 28/03/2018: <a href="https://business-humanrights.org">business-humanrights.org</a>]</li> <li>• Not met: Including to AP suppliers: See above. Not clear how the Company's suppliers cascade this commitment down their supply chain. [Submission to the CHRB Disclosure Platform: 'Response to CHRB', 28/03/2018: <a href="https://business-humanrights.org">business-humanrights.org</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: How HR commitments made binding/contractual: The Company discloses on its website that 'our finished-goods suppliers are required to sign a lengthy and comprehensive agreement which, among other things, requires them to comply with all applicable laws (which include those regarding slavery and human trafficking) and our Global Standards for Suppliers' and 'our suppliers of component materials and parts are also required via our purchase order process to comply with our Global Standards for Suppliers and all applicable laws (which include those regarding slavery and human trafficking)'.  <li>• Not met: Including on AP suppliers: The Responses to Corporate Human Rights Benchmark document discloses that 'our Global Standards for Suppliers are provided to all suppliers who are contractually bound to abide by them and the Fair Labour Association guidelines'. However, it is not clear how the Company suppliers then cascade this commitment down their supply chain. [Submission to the CHRB Disclosure Platform: 'Response to CHRB', 28/03/2018: <a href="https://business-humanrights.org">business-humanrights.org</a>]</li> </li></ul>
B.1.5	Training on Human Rights	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Trains all workers on HR policy commitments</li> <li>• Not met: Trains relevant managers including procurement</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> </ul>
B.1.6	Monitoring and corrective actions	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Monitoring implementation of HR policy commitments: According to the Company's Response to the disclosure platform, it has a human rights auditing program. The audits are performed on both 'owned a contractor facilities using a proprietary, scored auditing system covering over 200 questions (...) This scoring system allows us to objectively compare facilities on range of human rights issues and to track progress of a facility numerically over time. Every new facility must be audited to this scorecard by an internationally recognized, independent auditing firm (we approve and train each auditor at each firm) before production can begin and each year thereafter. Our internal audit teams consisting of over a dozen auditors across the globe then work with facilities through corrective action plans ("CAP's") if issues for improvement are identified'. The same document also</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>discloses that the Company audits 'all facilities, owned and contracted. The scorecard auditing process allows us to look directly into areas of weakness question by question. Our internal auditing teams work directly with each facility on corrective action findings until completion. As items are corrected, the facility's score increases, and we are able to track those increases over time'. Although the Global code of conduct does not cover all International Labour Organization core labour standards, the Human rights policy states that 'for a more detailed explanation of the expectations we have of our owned and supplier facilities, please see our Global Standards for Suppliers', which is the document that covers all the ILO core labour standards. [Submission to the CHRB Disclosure Platform: 'Response to CHRB', 28/03/2018: <a href="https://business-humanrights.org">business-humanrights.org</a> &amp; Global Human Rights Policy, 03/05/2018: <a href="https://hanesforgood.com">hanesforgood.com</a>]</p> <ul style="list-style-type: none"> <li>• Met: Monitoring AP suppliers: As above</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Describes corrective action process</li> <li>• Not met: Example of corrective action</li> <li>• Not met: Discloses % of supply chain monitored</li> </ul>
B.1.7	Engaging business relationships	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: HR affects selection of suppliers: According to the Company's Responses to Corporate Human Rights Benchmark document, the scoring provided by the auditing process allows the supply chain management teams to select facilities and make buying decisions. The goal of Hanesbrands is to work with facilities which improve their human rights compliance. The Company discloses the number of facilities disapproved in the latest reporting year. The Company states in its Response to CHRB Company Assessment that 'human rights compliance directly, and in some cases immediately, effects our buying decisions. HBI's goal is to work with facilities to see them improve. However, if they don't they will be disapproved and no longer be used in our production. We also reward facilities with high audit scores with more business'. [Submission to the CHRB Disclosure Platform: 'Response to CHRB', 28/03/2018: <a href="https://business-humanrights.org">business-humanrights.org</a>]</li> <li>• Met: HR affects on-going supplier relationships: The Company states in its Response to CHRB Company Assessment that 'human rights compliance directly, and in some cases immediately, effects our buying decisions. HBI's goal is to work with facilities to see them improve. However, if they don't they will be disapproved and no longer be used in our production. We also reward facilities with high audit scores with more business'.</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Both requirement under score 1 met</li> <li>• Not met: Working with suppliers to improve performance</li> </ul>
B.1.8	Approach to engagement with potentially affected stakeholders	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Stakeholder process or systems: The Company states in its Responses to Corporate Human Rights Benchmark document that is a member of the Fair Labour Association, that is engaged with local members of the non-governmental organization community and labour organizations on a case-by-case basis, and provides some examples of organisations it collaborates with, such as the Workers' Rights Consortium, Maquiladora Solidarity Network, the America's Group, global representatives of the ILO Better Works programs, and local members of NGO communities. It notes that these engagements often lead to recommendations of local stakeholders with whom we should additionally engage. The Company does not provide details on the frequency and triggers for engagement, or how these stakeholder views are analysed and actioned. [Submission to the CHRB Disclosure Platform: 'Response to CHRB', 28/03/2018: <a href="https://business-humanrights.org">business-humanrights.org</a>]</li> <li>• Not met: Frequency and triggers for engagement</li> <li>• Not met: workers in the SP engaged</li> <li>• Not met: communities in the SC engaged</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Analysis of stakeholder views and company's actions on them</li> </ul>

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.1	Identifying: Processes and triggers for identifying human rights risks and impacts	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Identifying risks in own operations: The Company discloses in its Responses to Corporate Human Rights Benchmark document that its scorecard audit process, covering over 200 questions to its owned and contractor facilities, 'provides a wealth of information about our substantive and geographic risks'. However it does not describe the process to identify its human rights risks and impacts in specific locations or activities. [Submission to the CHRB Disclosure Platform: 'Response to CHRB', 28/03/2018: <a href="https://business-humanrights.org">business-humanrights.org</a>]</li> <li>• Not met: Identifying risks in AP suppliers</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Ongoing global risk identification</li> <li>• Not met: In consultation with stakeholders</li> <li>• Not met: In consultation with HR experts</li> <li>• Not met: Triggered by new circumstances</li> </ul>
B.2.2	Assessing: Assessment of risks and impacts identified (salient risks and key industry risks)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Salient risk assessment (and context): The Company states in its Response to CHRB Company Assessment that 'addresses its salient human rights issues through its extensive ERM process. The leadership team charged with oversight of the ERM process meets regularly (3 – 4 times a year) with the VP CSR and others to discuss those risks. There is a specific section in the ERM document reviewed with the Audit Committee of the Board that is dedicated to human rights risks and is updated several times each year'. However the Company does not describe how geographical, economic, social or other relevant factors are taken into account neither discloses the results of the assessment. [Submission to the CHRB Disclosure Platform: 'Response to CHRB', 28/03/2018: <a href="https://business-humanrights.org">business-humanrights.org</a>]</li> <li>• Not met: Public disclosure of salient risks</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> </ul>
B.2.3	Integrating and Acting: Integrating assessment findings internally and taking appropriate action	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Action Plans to mitigate risks</li> <li>• Met: Example of Actions decided: The Company discloses in its Responses to Corporate Human Rights Benchmark document its understanding of 'withholding passports and recruitment fees can often lead to situations tantamount to forced labour' and provides the example of 'a number of occasions when we have required contractors to stop withholding passports and/or to repay employees for recruitment fees that employees improperly incurred as a condition of continuing our business with them'. [Submission to the CHRB Disclosure Platform: 'Response to CHRB', 28/03/2018: <a href="https://business-humanrights.org">business-humanrights.org</a>]</li> <li>• Met: Including in AP supply chain</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> </ul>
B.2.4	Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: System to check if Actions are effective: The Company discloses in its Responses to Corporate Human Rights Benchmark document that tracks 'corrective action plans developed as part of our scorecard auditing process in custom designed, web-based software. This software allows us and the suppliers, easy access to a facility's required corrective actions. Our internal compliance teams work closely with each supplier to ensure appropriate remedial actions are taken and corrective action plans are closed in the system'. The Company states in its Response to CHRB Company Assessment that 'We routinely use the data generated to make decisions on who we should focus our remedial efforts on and which facilities should be excluded from our supply chain network. In 2017, we will disapprove in excess of 50 factories based on data generated in the software.' [Submission to the CHRB Disclosure Platform: 'Response to CHRB', 28/03/2018: <a href="https://business-humanrights.org">business-humanrights.org</a>]</li> <li>• Not met: Lessons learnt from checking effectiveness</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Both requirement under score 1 met: As for lessons learned, the Company states that by using a scored auditing tool, they numerically track improvement (or lack thereof) over time. Improvements on issues like hours worked are often driven by the leverage the Company has with a facility. The Company states 'We</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			have learned through this process that we need fewer, larger facilities to have the leverage to continue to sustainably effect positive change on a range of human rights issues'. [Submission to the CHRB Disclosure Platform: 'Response to CHRB', 28/03/2018: <a href="https://business-humanrights.org">business-humanrights.org</a> ]
B.2.5	Communicating : Accounting for how human rights impacts are addressed	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Comms plan re identifying risks: The Company discloses in its Responses to Corporate Human Rights Benchmark document that 'we frequently engage with a range of human rights stakeholders to hear, understand and address their concerns, often in their local language. We pride ourselves in the open, transparent relationship we have with many of them, which often leads to engagement on a case-by-case basis. Also, as a member of the FLA, we engage in the FLA third-party complaint process when a complaint is filed with the FLA regarding one of our suppliers. The FLA fully investigates these cases and publicly reports on their outcomes. Very simply, we respond to all allegations of human rights violations and work closely with stakeholders to resolve issues in local language, if necessary.'</li> <li>• However it does not clear the criteria to communicate or how it ensures communication to affected stakeholders. stakeholders. [Submission to the CHRB Disclosure Platform: 'Response to CHRB', 28/03/2018: <a href="https://business-humanrights.org">business-humanrights.org</a>]</li> <li>• Not met: Comms plan re assessing risks</li> <li>• Not met: Comms plan re action plans for risks</li> <li>• Met: Comms plan re reviewing action plans: The Company has communicated in its public response to the CHRB disclosure platform that it has a system to track actions taken in response to human rights risks and impacts, and evaluating whether the actions have been effective. In this disclosure, it communicates examples of lessons learned. [Submission to the CHRB Disclosure Platform: 'Response to CHRB', 28/03/2018: <a href="https://business-humanrights.org">business-humanrights.org</a>]</li> <li>• Not met: Including AP suppliers</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Responding to affected stakeholders concerns</li> <li>• Not met: Ensuring affected stakeholders can access communications</li> </ul>

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.1	Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Channel accessible to all workers: The Company's Global Code of Conduct, which contains the human rights policy, discloses the options for employees to raise concerns. Among them, a third-party ethics point website, an email address and a toll-free phone line with translators 'available to speak in your native language'. Moreover, the Responses to Corporate Human Rights Benchmark document discloses that Hanesbrands uses a third-party resource, Navex Global, to answer and log employee 'complaints/issues in over 20 different languages. There are toll-free "Resource Lines" in every country in which we do business (nearly 40) accessible 24/7, 365 days/year, as well as a web link that employees (...) can use to come forward with a complaint or issue confidentially and without fear of any reprisal' and 'retaliation in any form will not be tolerated'.</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Number grievances filed, addressed or resolved</li> <li>• Not met: Channel is available in all appropriate languages</li> <li>• Met: Expect AP supplier to have equivalent grievance systems: In their response to the CHRB the Company states 'We also have well-developed open door policies that employees in our plants and elsewhere have helped to design and implement. We expect our third party suppliers to have similar, appropriate grievance systems, and monitor them through our scorecard auditing process.' In addition the Company clarified to the CHRB that 'All suppliers are given a full copy of our audit protocol so this requirement is conveyed to them. If they fail to do so, they are required to implement an appropriate grievance system as part of the corrective action process.' [Submission to the CHRB Disclosure Platform: 'Response to CHRB', 28/03/2018: <a href="https://business-humanrights.org">business-humanrights.org</a> &amp; CHRB Score Sheet Response, 18/06/2018]</li> <li>• Not met: Opens own system to AP supplier workers</li> </ul>
C.2	Grievance channel(s)/mechanism(s) to receive complaints or concerns from	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Grievance mechanism for community: The Company's Responses to Corporate Human Rights Benchmark document discloses that Hanesbrands uses a third-party resource, Navex Global, to answer and log 'third-party complaints/issues in over 20 different languages. There are toll-free "Resource Lines" in every country in which we do business (nearly 40) accessible 24/7, 365</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
	external individuals and communities		<p>days/year, as well as a web link that (...) third-parties can use to come forward with a complaint or issue confidentially and without fear of any reprisal' and 'retaliation in any form will not be tolerated'. The same document states that Hanesbrands expects its suppliers 'to have appropriate grievance systems and monitor that through our scorecard auditing process'. However it is unclear if they convey the same expectation to their suppliers. [Submission to the CHRB Disclosure Platform: 'Response to CHRB', 28/03/2018: <a href="https://business-humanrights.org">business-humanrights.org</a>]</p> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Describes accessibility and local languages: See above</li> <li>• Met: Expects AP supplier to have community grievance systems: See above</li> <li>• Not met: AP supplier communities use global system</li> </ul>
C.3	Users are involved in the design and performance of the channel(s)/mechanism(s)	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Engages users to create or assess system</li> <li>• Met: Description of how they do this: The Company states in the Responses to Corporate Human Rights Benchmark document that Hanes brand 'frequently seek the input of many across the organization and train against the availability and use of the Resource Line and web portal through which complaints can be made. Input comes heavily from the nearly 40 Code of Conduct Officers we have around the globe. We recently surveyed nearly 10,000 employees to ensure that they are aware of them, know how to use them and feel comfortable doing so, i.e. do not fear retaliation. Over 90 percent of those surveyed answered in the affirmative. We expect suppliers to have similar, appropriate grievance systems and monitor the existence and effectiveness of such systems through our scored audit process.' [Submission to the CHRB Disclosure Platform: 'Response to CHRB', 28/03/2018: <a href="https://business-humanrights.org">business-humanrights.org</a>] <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Engages with users on system performance</li> <li>• Not met: Provides user engagement example on performance</li> <li>• Not met: AP suppliers consult users in creation or assessment</li> </ul> </li></ul>
C.4	Procedures related to the mechanism(s)/channel(s) are publicly available and explained	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Response timescales: The Company states in the Responses to Corporate Human Rights Benchmark document that 'complaints/issues can come in through the Resource Line, web portal or the management hierarchy. Those through the Resource Line are initially managed by a third-party service, Navex Global (...), who answers the line in the caller's local language and logs the complaint into its database. Hanesbrands is then immediately notified. A small team of trained personnel then receive and initially triage the issue. After this initial review, it is assigned out to a trained investigator, typically the country Code of Conduct Officer (we have one in every country in which we do business). Each matter is then fully investigated and reported back to headquarters with a recommendation for next steps. It is again reviewed by the small, headquarters team before the matter is closed or any disciplinary measure is taken. For issues of particular severity, especially those that may be deemed "material" to the organization, the senior management team will be engaged initially and throughout the process, helping to manage the investigation and to make disciplinary decisions prior to closing the case. The typical investigation lasts 14-30 days, and the complaining party is often contacted multiple times throughout the process, always in their local language, to provide additional information if necessary. They are then appropriately informed of the final outcome'. Moreover, the Global Code of Conduct states that whoever makes a report through the Resource Line, receives an identification number to follow-up the concern. [Submission to the CHRB Disclosure Platform: 'Response to CHRB', 28/03/2018: <a href="https://business-humanrights.org">business-humanrights.org</a>]</li> <li>• Met: How complainants will be informed</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Escalation to senior/independent level</li> </ul>
C.5	Commitment to non-retaliation over complaints or concerns made	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Public statement prohibiting retaliation: The Company states in the Responses to Corporate Human Rights Benchmark document that 'we have not and will not impede state based judicial or non-judicial actions for persons making allegations of adverse human rights actions and have not and will not require anyone to waive legal rights as a condition of participating in our grievance process'. The Company also states that it 'will cooperate as necessary and as required by law with any state based judicial or non-judicial actions resulting from human rights complaints or allegations. We have required contract suppliers to reinstate workers wrongly terminated for exercising their rights to freely associate</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>when required by local labour ministries. As a result, we have instituted direct training on freedom of association at a range of contractor facilities at risk. We make it very clear that those who retaliate will be subject to discipline up to and including termination of employment. We have had to discipline and terminate individuals found to have retaliated. We have never brought a retaliatory action against anyone or their representatives for bringing forward a complaint or issue in good faith. We have and express the same set of expectations for all suppliers.'</p> <p>[Submission to the CHRB Disclosure Platform: 'Response to CHRB', 28/03/2018: <a href="https://business-humanrights.org">business-humanrights.org</a>]</p> <ul style="list-style-type: none"> <li>• Met: Practical measures to prevent retaliation</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Has not retaliated in practice</li> <li>• Met: Expects AG suppliers to prohibit retaliation</li> </ul>
C.6	Company involvement with State-based judicial and non-judicial grievance mechanisms	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Won't impede state based mechanisms: The Company states in the Responses to Corporate Human Rights Benchmark document that 'we have not and will not impede state based judicial or non-judicial actions for persons making allegations of adverse human rights actions and have not and will not require anyone to waive legal rights as a condition of participating in our grievance process'. The Company also states that it 'will cooperate as necessary and as required by law with any state based judicial or non-judicial actions resulting from human rights complaints or allegations. We have required contract suppliers to reinstate workers wrongly terminated for exercising their rights to freely associate when required by local labour ministries. As a result, we have instituted direct training on freedom of association at a range of contractor facilities at risk. We make it very clear that those who retaliate will be subject to discipline up to and including termination of employment. We have had to discipline and terminate individuals found to have retaliated. We have never brought a retaliatory action against anyone or their representatives for bringing forward a complaint or issue in good faith. We have and express the same set of expectations for all suppliers.' <p>[Submission to the CHRB Disclosure Platform: 'Response to CHRB', 28/03/2018: <a href="https://business-humanrights.org">business-humanrights.org</a>]</p> <ul style="list-style-type: none"> <li>• Met: Complainants not asked to waive rights</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Will work with state based or non judicial mechanisms</li> <li>• Met: Example of issue resolved (if applicable)</li> </ul> </li></ul>
C.7	Remedying adverse impacts and incorporating lessons learned	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Describes how remedy has been provided: The Company explains in its Response to CHRB Company Assessment the scorecard auditing process. The Company states ' As items are corrected, the facility's score increases, and we are able to track those increases over time.' The Company does not provide information with regards to how 'items are corrected' and the process for providing remedy for individuals. There is no evidence for timely remedy for any salient adverse human right impacts or the approach taken in case any identified. <p>[Submission to the CHRB Disclosure Platform: 'Response to CHRB', 28/03/2018: <a href="https://business-humanrights.org">business-humanrights.org</a>]</p> <ul style="list-style-type: none"> <li>• Not met: Says how it would remedy key sector risks</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Changes introduced to stop repetition</li> <li>• Not met: Approach to learning from incident to prevent future impacts</li> <li>• Not met: Evaluation of the channel/mechanism</li> </ul> </li></ul>

## 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	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Living wage target timeframe</li> <li>• Not met: Describes how living wage determined</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Achieved payment of living wage</li> <li>• Not met: Regularly review definition of living wage with unions</li> </ul>
D.2.1.b	Living wage (in the supply chain)	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Living wage in supplier code or contracts</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Met: Improving living wage practices of suppliers: The Company states in the Responses to Corporate Human Rights Benchmark document that as a member of the Fair Labour Association, it is working with that organization to evaluate fair compensation across its supply base. The Company's Global Standards for Suppliers state that 'suppliers will, at a minimum, comply with applicable wage and hour laws and regulations, including those relating to minimum wages'. The Company states in its Response to CHRB Company Assessment that 'It is a contractual commitment for suppliers to pay at least the minimum wage. It also a requirement of the FLA to evaluate fair compensation across our entire supply chain (owned and 3rd party contractors)'. [Submission to the CHRB Disclosure Platform: 'Response to CHRB', 28/03/2018: <a href="https://business-humanrights.org">business-humanrights.org</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> <li>• Not met: Provide analysis of trends in progress made</li> </ul>
D.2.2	Aligning purchasing decisions with human rights	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Avoids business model pressure on HRs: The Company states in the Responses to Corporate Human Rights Benchmark document that 'as an outcome of the scorecard auditing process, we have a wealth of data on factories' performance to our human rights standards. We are thus able to both penalize poor performing factories by withholding business and reward high performers by providing continued or additional business' and 'those factories with whom we have the largest and longest relationships score higher to very higher on our scorecard. Size and scale matter, and we will continue, as a rule, to support these facilities and find more of them'. The Company discloses in its Response to CHRB Company Assessment that 'An example of a business interest that may, at times, be in conflict with human rights is lead times. Hanesbrands has worked with retailers to improve average lead times to avoid creating bottlenecks that negatively impact hours worked, i.e. excessive overtime'. [Submission to the CHRB Disclosure Platform: 'Response to CHRB', 28/03/2018: <a href="https://business-humanrights.org">business-humanrights.org</a>]</li> <li>• Met: Positive incentives to respect human rights</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> </ul>
D.2.3	Mapping and disclosing the supply chain	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Identifies suppliers back to product source (farm, ranch etc): The Company states in the Responses to Corporate Human Rights Benchmark document that 'we do map our suppliers beyond tier one, especially for our owned capacity (80% of our volume). We can map the cotton used for our internal production back to the east coast of the U.S., know exactly where the yarn is being produced to make nearly all of our fabric in our owned textile mills (Dominican Republic and El Salvador), and sew the garments in our own factories in Central America, the Caribbean, Vietnam, Thailand, Philippines and Indonesia. We have disclosed these and other facilities on our <a href="https://hanesforgood.com">hanesforgood.com</a> website. The Company discloses a list of all its owned facilities and contractors on its website and another list with all the smelters or refiners of conflict minerals used in its garments' metal components, broken down by type of mineral, and has an in-depth process to track the source of conflict minerals in our supply chain. . (<a href="https://hanesforgood.com">hanesforgood.com</a> [Submission to the CHRB Disclosure Platform: 'Response to CHRB', 28/03/2018: <a href="https://business-humanrights.org">business-humanrights.org</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Discloses significant parts of supply chain and why: The Company publishes lists of their strategic contractor factories, HBI Self owned factories, and collegiate factories. These lists contain information such as the parent company, the factory name, the country of operation, address product type and employee band (&lt;1000, 1000-3000, &gt;3000). [Supplier Map - Collegiate, 30/07/2018: <a href="https://hanesforgood.com">hanesforgood.com</a> &amp; Supplier Map - Strategic Contractor, 30/07/2018: <a href="https://hanesforgood.com">hanesforgood.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.2.4.a	Child labour: Age verification and corrective actions (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"> <li>Met: Does not use child labour: The Company states in the Responses to Corporate Human Rights Benchmark document that 'We absolutely prohibit the use of child labour and insist on appropriate age verification across both our owned and supplier facilities. We monitor this very closely as part of our scorecard auditing process described earlier. We have never had a case of underage labour in our owned facilities given our very strenuous internal processes. In the few cases where we have identified such in our contractor facilities, we have insisted on and overseen a process to get the young worker out of the workplace immediately and (1) into local schools at the expense of the contractor or (2) have required the contractor to immediately pay the young worker all monies owed up to the age of majority. We have had few cases of underage labour, especially in the last 5 years, due largely to our very intensive auditing program.' [Submission to the CHRB Disclosure Platform: 'Response to CHRB', 28/03/2018: <a href="https://business-humanrights.org">business-humanrights.org</a>]</li> <li>Met: Age verification of applicants and workers</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Met: Remediation if children identified</li> </ul>
D.2.4.b	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"> <li>Met: Child Labour rules in codes or contracts: The Company states in their Global Human Rights Policy that 'Neither HanesBrands, nor its suppliers, will employ individuals in violation of the local mandatory school age or who have not reached legal employment age in the respective countries where we operate. Moreover, in no case will HanesBrands or its suppliers employ workers under the age of 15, except for child actors and models employed in advertising or media who are protected by applicable child labor requirements.' In their Global Standards for Suppliers the Company states the same text. In the Responses to Corporate Human Rights Benchmark document it states that 'we absolutely prohibit the use of child labour and insist on appropriate age verification across our owned facilities and broader supply chain. We monitor this very closely as part of our scorecard auditing process' and 'in the few cases where we have identified such in our contractor facilities, we have insisted on and overseen a process to get the young worker out of the workplace immediately and (1) into local schools at the expense of the contractor or (2) have required the contractor to immediately pay the young worker all monies owed up to the age of majority'. However, it does not disclose include information regarding remediation programs in their contractual arrangements with suppliers. [Global Human Rights Policy, 03/05/2018: <a href="https://hanesforgood.com">hanesforgood.com</a> &amp; Global Standards for Suppliers, 03/05/2018]</li> <li>Not met: How working with suppliers on child labour</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Not met: Both requirements under score 1 met</li> <li>Not met: Provide analysis of trends in progress made</li> </ul>
D.2.5.a	Forced labour: Debt bondage and other unacceptable financial costs (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"> <li>Met: Pays workers in full and on time: The Company states in its Response to CHRB Company Assessment that 'the company does require that all workers receive a payslip with their wages, with any deductions clearly identified. All workers are paid in full and on-time, and we require workers to pay no work related fees or costs'. [Submission to the CHRB Disclosure Platform: 'Response to CHRB', 28/03/2018: <a href="https://business-humanrights.org">business-humanrights.org</a>]</li> <li>Met: Payslips show any legitimate deductions: As above</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Met: How these practices are implemented and monitored for agencies, labour brokers or recruiters: The Company states 'Nearly all of our owned operations hire directly, i.e. do not use agencies or brokers. If they are used, we audit to ensure compliance with these standards as part of our scored audit process'. The standards referred to cover debt bondage and other unacceptable financial costs. [CHRB Score Sheet Response, 18/06/2018]</li> </ul>
D.2.5.b	Forced labour: Debt bondage and other unacceptable financial costs (in the supply chain)	1.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Met: Debt and fees rules in codes or contracts: The Company states in its Global Standards for Suppliers that 'suppliers will not use forced or involuntary labour whether bonded, prison or indentured, including debt servitude'.</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Met: How working with suppliers on debt &amp; fees: Moreover, in its Responses to Corporate Human Rights Benchmark document, the Company discloses that 'we strongly oppose any form of forced or bonded labour, including the imposition of recruitment fees in our owned or supplier facilities. We have suppliers in high risk countries like Jordan sign a separate statement indicating they will not impose recruiting fees. We also interview workers as part of our scorecard auditing process to determine whether they were required to pay such fees. Where we have found issues, we have required not only immediate cessation of such fees but also the return of such monies to the worker. [Submission to the CHRB Disclosure Platform: 'Response to CHRB', 28/03/2018: <a href="https://business-humanrights.org">business-humanrights.org</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Both requirements under score 1 met: As above.</li> <li>• Not met: Provide analysis of trends in progress made: The Company states 'As for trending, we are seeing less of this [debt and fees in recruitment], especially in very large contractors supplying international brands. Large brands, like Hanesbrands, have focused on this issue extensively in recent years and have driven much of it out of their supply chains through very aggressive auditing'. However, this is not sufficient information to be considered an analysis of trends. [Submission to the CHRB Disclosure Platform: 'Response to CHRB', 28/03/2018: <a href="https://business-humanrights.org">business-humanrights.org</a>]</li> </ul>
D.2.5.c	Forced labour: Restrictions on workers (in own production or manufacturing operations)	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Does not retain documents or restrict movement: In its Responses to Corporate Human Rights Benchmark document, the Company discloses that 'we do not withhold passports in our own facilities and do not restrict employee movement'. [Submission to the CHRB Disclosure Platform: 'Response to CHRB', 28/03/2018: <a href="https://business-humanrights.org">business-humanrights.org</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: How sure about agencies or brokers: The Company states in a disclosure to CHRB 'Nearly all of our owned operations hire directly, i.e. do not use agencies or brokers. If they are used, we audit to ensure compliance with these standards as part of our scored audit process'. These standards refers to forced labour standards. [CHRB Score Sheet Response, 18/06/2018]</li> </ul>
D.2.5.d	Forced labour: Restrictions on workers (in the supply chain)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Free movement rules in codes or contracts: The Global Standards for Suppliers does not cover Free movement and it is not clear if this is a contractual arrangement. [Submission to the CHRB Disclosure Platform: 'Response to CHRB', 28/03/2018: <a href="https://business-humanrights.org">business-humanrights.org</a> &amp; Global Standards for Suppliers, 03/05/2018]</li> <li>• Not met: How these practices are implemented and monitored for agencies, labour brokers or recruiters: In its Responses to Corporate Human Rights Benchmark document, the Company discloses that 'we have demanded for many years that suppliers not retain worker passports and in no way restrict their movement through the retention of payment mechanisms. It is the very rare case now that we find a supplier withholding passports. Intensive auditing has driven that practice largely out of existence in our experience'. However, this does not explain how the Company specifically works with suppliers to eliminate these practices.</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> <li>• Not met: Provide analysis of trends in progress made [Submission to the CHRB Disclosure Platform: 'Response to CHRB', 28/03/2018: <a href="https://business-humanrights.org">business-humanrights.org</a>]</li> </ul>
D.2.6.a	Freedom of association and collective bargaining (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"> <li>• Met: Commits not to interfere with union rights and collective bargaining and prohibits intimidation and retaliation: The Company Global Human Rights Policy states 'HanesBrands respects the 'rights of our employees, and those of our suppliers, to join, form (or not join or form) a labor union. We protect the free exercise of those rights without fear of reprisal of any kind.' [Global Human Rights Policy, 03/05/2018: <a href="https://hanesforgood.com">hanesforgood.com</a>]</li> <li>• Not met: Discloses % covered by collective bargaining: The Company's Global Code of Conduct states that 'we also respect the right of employees to exercise their right of free association and to choose or not choose collective bargaining representation'. In its Annual Report, it states that 'less than 50 of our employees in the United States and a significant number of our international employees are members of labour organizations or are covered by collective bargaining agreements'. [Annual Report, 43099]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			Score 2 <ul style="list-style-type: none"> <li>Not met: Both requirement under score 1 met</li> </ul>
D.2.6.b	Freedom of association and collective bargaining (in the supply chain)	1.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Met: FoA &amp; CB rules in codes or contracts: The Company's Global Standards for Suppliers states that 'suppliers will respect the right of employees to exercise their lawful right of free association. Similarly, suppliers will recognize the lawful rights of their employees to choose or not choose collective bargaining representation'. Moreover, the Responses to Corporate Human Rights Benchmark document states that the Company 'fully respect the right of workers to freely associate and collectively bargain and insist on that in our own operations and the operations of our suppliers.' [Global Standards for Suppliers, 03/05/2018 &amp; Submission to the CHRB Disclosure Platform: 'Response to CHRB', 28/03/2018: <a href="https://business-humanrights.org">business-humanrights.org</a>]</li> <li>Met: How working with suppliers on FoA and CB: The Company states in the Responses to Corporate Human Rights Benchmark document 'We have numerous unions in our facilities and work with them frequently through the collective bargaining process. We audit against this issue heavily in our scorecard auditing process and have on a number of occasions required reinstatement of terminated employees (with back pay) when we have identified cases where employees have been terminated for exercising those rights. As for trending, this remains an issue of concern for us in our supply base. We have dealt with cases just in the last year where we have required reinstatement of affected employees. We audit against the issue closely and interview workers on this point directly when conducting our audits. We make it very clear to suppliers what our expectations are'. [Submission to the CHRB Disclosure Platform: 'Response to CHRB', 28/03/2018: <a href="https://business-humanrights.org">business-humanrights.org</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Met: Both requirements under score 1 met</li> <li>Not met: Provide analysis of trends in progress made: There is no clear analysis of trends in progress made amongst suppliers. Although the Company states that they are addressing this as a concern (see above), analysis and reporting on progressions are not apparent. [Submission to the CHRB Disclosure Platform: 'Response to CHRB', 28/03/2018: <a href="https://business-humanrights.org">business-humanrights.org</a>]</li> </ul>
D.2.7.a	Health and safety: Fatalities, lost days, injury rates (in own production of manufacturing operations)	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Met: Injury Rate disclosures: The Company states 'our recordable injury rate across all owned facilities in 2017 was .40. By way of comparison, the average recordable rate for apparel manufacturing is 1.5, nearly 4 times our low rate. Despite our low injury rate, our goal is to drive it down further in 2018 to .36. There were no fatalities in 2017. A large part of our scorecard auditing process involves an intensive look at a facility's safety practices and performance. Identified issues are included in a corrective action plan and followed closely until improvements are made.' [Submission to the CHRB Disclosure Platform: 'Response to CHRB', 28/03/2018: <a href="https://business-humanrights.org">business-humanrights.org</a>]</li> <li>Not met: Lost days or near miss disclosure</li> <li>Met: Fatalities disclosures: See above.</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Not met: Set targets for H&amp;S performance: The Company states that they have a goal to drive down their injury rate to .36. However, the Company does not have a target for fatalities. Furthermore, the Company has set the goal but not reported against it and explained why targets have been met or not met. [Submission to the CHRB Disclosure Platform: 'Response to CHRB', 28/03/2018: <a href="https://business-humanrights.org">business-humanrights.org</a>]</li> <li>Not met: Met targets or explains why not</li> </ul>
D.2.7.b	Health and safety: Fatalities, lost days, injury rates (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Not met: Sets out clear Health and Safety requirements</li> <li>Not met: Injury rate disclosures</li> <li>Not met: Lost days or near miss disclosures</li> <li>Not met: Fatalities disclosures</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Not met: How working with suppliers on H&amp;S</li> <li>Not met: Provide analysis of trends in progress made</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
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"> <li>• Not met: Process to stop harassment and violence: The Company states in their Global Human Rights Policy that they prohibit discrimination based on 'on race, colour, religion, gender (including gender identity or expression), national origin, age, disability, sexual orientation, veteran status, marital status, economic status, political opinion or any other factor protected by law.' The Company then states 'Harassment based on these factors, including sexual harassment, is not tolerated.' The Global Human Rights Policy further stipulates 'Hanesbrands' commitment is to treat everyone fairly and to maintain a work environment free of bias and retaliation, regardless of whether the work environment is a professional office, a production facility, or a work-related activity taking place outside the usual workplace. ' However, the Company does not detail their process to stop intimidation and violence against women. [Global Human Rights Policy, 03/05/2018: <a href="http://hanesforgood.com">hanesforgood.com</a>]</li> <li>• Not met: Working conditions take account of gender</li> <li>• Met: Equality of opportunity at all levels: In its Responses to Corporate Human Rights Benchmark document, the Company discloses that 'we train all employees heavily on our harassment and discrimination standards in our Code of Conduct'. However the code does not cover women's rights. It also states that 20% of its Board of Directors is comprised of women, and there are four women as plant managers 'and several more who are being trained and groomed for these roles'. The same document discloses that Hanesbrands has a global director of diversity and inclusion whose job it is to oversee our diversity program and practices to, among other things, ensure that women's issues are addressed appropriately across our entire organization'. [Submission to the CHRB Disclosure Platform: 'Response to CHRB', 28/03/2018: <a href="http://business-humanrights.org">business-humanrights.org</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Meets all of the requirements under score 1</li> </ul>
D.2.8.b	Women's rights (in the supply chain)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Women's rights in codes or contracts: In the Responses to Corporate Human Rights Benchmark document, the Company discloses that Hanesbrands has 'a global director of diversity and inclusion whose job it is to oversee our diversity program and practices to, among other things, ensure that women's issues are addressed appropriately across our entire organization'. It does not however include women's rights in codes or contracts, or in written rules and work practices. [Submission to the CHRB Disclosure Platform: 'Response to CHRB', 28/03/2018: <a href="http://business-humanrights.org">business-humanrights.org</a>]</li> <li>• Not met: How working with suppliers on women's rights</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both requirement under score 1 met</li> <li>• Not met: Provide analysis of trends in progress made</li> </ul>
D.2.9.a	Working hours (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"> <li>• Not met: Respects max hours, min breaks and rest periods in its own operations: The Company discloses ' we require our owned facilities and suppliers to work no more than 48 regular hours / week plus 12 hours overtime, other than in extraordinary circumstances. We routinely audit against this at our owned and supplier facilities as part of our scored audit process. ' However, the 'extraordinary circumstances' clause shows that this is not always implemented. Furthermore, the Company has not indicated that it respects applicable international standards and national laws and regulations concerning minimum breaks and rest periods in its own operations.</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: How it implements and checks this: In the Responses to Corporate Human Rights Benchmark document, the Company discloses that 'by way of example, we worked very closely with a large factory in Jordan who was able to reduce its total weekly hours to 60, our standard, largely through the implementation of lean principles and efficiency gains'. The Company further states 'We work routinely with our suppliers on working hours as part of our scored audit process and call-out a specific example of success in Jordan. We have generally seen total working hours fall across our supplier base over the last 5+ years, due heavily to our strict auditing process. ' However, there is no information related to minimum breaks and rest periods. [Submission to the CHRB Disclosure Platform: 'Response to CHRB', 28/03/2018: <a href="http://business-humanrights.org">business-humanrights.org</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.2.9.b	Working hours (in the supply chain)	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Met: Working hours in codes or contracts: The Company's Global Standards for Suppliers states that 'suppliers will comply with all applicable laws and regulations regarding working hours'. [Global Standards for Suppliers, 03/05/2018]</li> <li>• Not met: How working with suppliers on working hours</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> <li>• Not met: Provide analysis of trends in progress made</li> </ul>

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
E(1).0	Serious allegation No 1		No allegations meeting the CHRB severity thresholds were found, and so the score of 37.42 out of 80 points scored in themes A-D & F has been applied to produce a score of 9.36 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	2.83 out of 4	Out of a total of 48 indicators assessed under sections A-D of the benchmark, Hanesbrands made data public that met one or more elements of the methodology in 34 cases, leading to a disclosure score of 2.83 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 <ul style="list-style-type: none"> <li>• Not met: Company reports on GRI</li> <li>• Not met: Company reports on SASB</li> <li>• Not met: Company reports on UNGPRF</li> </ul>
F.3	Key, High Quality Disclosures	0.8 out of 4	Hanesbrands met 2 of the 10 thresholds listed below and therefore gets 0.8 out of 4 points for the high quality disclosure indicator. Specificity and use of concrete examples <ul style="list-style-type: none"> <li>• Met: Score 2 for A.2.2 : Board discussions</li> <li>• Not met: Score 2 for B.1.6 : Monitoring and corrective actions</li> <li>• Not met: Score 2 for C.1 : Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers</li> <li>• Not met: Score 2 for C.3 : Users are involved in the design and performance of the channel(s)/mechanism(s)</li> </ul> Discussing challenges openly <ul style="list-style-type: none"> <li>• Met: Score 2 for B.2.4 : Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts</li> <li>• Not met: Score 2 for C.7 : Remedying adverse impacts and incorporating lessons learned</li> </ul> Demonstrating a forward focus <ul style="list-style-type: none"> <li>• Not met: Score 2 for A.2.3 : Incentives and performance management</li> <li>• Not met: Score 2 for B.1.2 : Incentives and performance management</li> <li>• Not met: Score 1 for D.2.1.a : Living wage (in own production or manufacturing operations)</li> <li>• Not met: Score 2 for D.2.7.a : Health and safety: Fatalities, lost days, injury rates (in own production of manufacturing operations)</li> </ul>

#### Disclaimer

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

See the 2018 Key Findings report for more details of the research process.

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

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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.