

## Corporate Human Rights Benchmark 2018 Company Scoresheet



**Company Name** Kering  
**Industry** Apparel (Supply Chain only)  
**Overall Score (\*)** 28.6 out of 100

Theme Score	Out of	For Theme
3.0	10	A. Governance and Policies
7.7	25	B. Embedding Respect and Human Rights Due Diligence
1.3	15	C. Remedies and Grievance Mechanisms
8.3	20	D. Performance: Company Human Rights Practices
5.7	20	E. Performance: Responses to Serious Allegations
2.6	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: The Company has indicated that it is committed to human rights and 'intend[s] to act as a socially responsible company' wherever it operates. [Code of ethics, 2013: <a href="http://kering.com">kering.com</a> ] • Not met: International Bill of Rights Score 2 • Not met: UNGPs • Not met: OECD: It has also indicated that its code 'reflects' the United Nations Universal Declaration of Human Rights or the OECD Guidelines for Multinational Enterprises but it has not publicly committed to respecting all the principles contained in these (no specific wording committing to the OECD Guidelines). [Code of ethics, 2013: <a href="http://kering.com">kering.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: UNGC principles 3-6: The code indicates that the Group's rules 'reflect' several international standards including 'the Ten Principles of the United Nations Global Compact. However, this is not considered a formal commitment following the CHRB wording criteria. The Code of ethics also contains the suppliers' charter. In this charter the Company discloses the following commitment: 'The Group has shown its commitments as a signatory of the United Nations Global Compact and through this support emphasises its defence of the ten principles of the Global Compact since 2008'. [Code of ethics, 2013: <a href="http://kering.com">kering.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 code of ethic contains the 'group suppliers' charter' which states it expects suppliers to respect the rights of workers related to working hours, health and safety, child labour, forced labour, freedom of association and non-discrimination. The Company's sustainability principles, which apply to all suppliers cover explicitly all ILO, as it does Puma's and Volcom's supplier codes. [Sustainability principles: <a href="http://kering.com">kering.com</a> &amp; Code of ethics, 2013: <a href="http://kering.com">kering.com</a>] Score 2</li> <li>• Met: All four ILO Core: The Company has an explicit commitment against child labour, forced labour, discrimination, and to respect the freedom of association. Collective bargaining is mentioned together with other ILO core conventions in the code when the Company states that its rules 'reflect several international standards'. [Code of ethics, 2013: <a href="http://kering.com">kering.com</a>]</li> <li>• Met: Respect H&amp;S of workers: Working conditions that comply with health and safety laws &amp; regulations [Code of ethics, 2013: <a href="http://kering.com">kering.com</a>]</li> <li>• Met: H&amp;S applies to AP suppliers: See above [Code of ethics, 2013: <a href="http://kering.com">kering.com</a>]</li> <li>• Not met: working hours for employees</li> <li>• Met: Working hours for AP suppliers: The suppliers' charter, included in the code of ethics, prohibits 'any behaviour contrary to dignity at work, especially any practice contrary to social regulations and in particular concerning remuneration, working hours and working conditions. [Code of ethics, 2013: <a href="http://kering.com">kering.com</a>]</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>• Met: Women's Rights: The Company indicates on its website that 'In line with its commitment in favour of women embodied by the Kering Foundation which combats Violence Against Women, in 2010, the Group was one of the first companies in France to sign the Women's Empowerment Principles' [Company website - Promote Diversity: <a href="http://kering.com">kering.com</a>]</li> <li>• Not met: Children's Rights: The Company's code of ethics states that the rules of conduct 'reflect' several international standards including 'the United Nations Convention on the Rights of the Child'. However, the use of word reflect referring to this convention does not count as formal commitment to the Convention on the Rights of the Child, and no further details found in relation to commitment to child's rights concerning the Company's operations. [Code of ethics, 2013: <a href="http://kering.com">kering.com</a>]</li> <li>• Not met: Migrant worker's rights</li> <li>• Not met: Expecting suppliers to respect these rights: Although the Company is signatory to the Women Empowerment Principles. Also, the Company's sustainability principles, which apply to all kering's and its brands suppliers, include a list of applicable international conventions at the end of the document, and this list include the United Nations' Convention on the rights of the Child and the United Nations' Convention on the Elimination of All Forms of Discrimination Against Women. However, no evidence found of a formal commitment to these conventions as part of the requirements or expectations for suppliers. [Sustainability principles: <a href="http://kering.com">kering.com</a>] Score 2</li> <li>• Met: CEDAW/Women's Empowerment Principles: The Company indicates on its website that 'In line with its commitment in favour of women embodied by the Kering Foundation which combats Violence Against Women, in 2010, the Group was one of the first companies in France to sign the Women's Empowerment Principles' [Company website - Promote Diversity: <a href="http://kering.com">kering.com</a>]</li> <li>• Not met: Child Rights Convention/Business principles</li> <li>• Not met: Convention on migrant workers</li> <li>• Not met: Respecting the right to water</li> <li>• Not met: Expecting suppliers to respect these rights: Although the Company is signatory to the Women Empowerment Principles. Also, the Company's sustainability principles, which apply to all kering's and its brands suppliers, include a list of applicable international conventions at the end of the document, and this list include the United Nations' Convention on the rights of the Child and the United Nations' Convention on the Elimination of All Forms of Discrimination Against Women. However, no evidence found of a formal commitment to these conventions as part of the requirements or expectations for suppliers. [Sustainability principles: <a href="http://kering.com">kering.com</a>]</li> </ul>
A.1.4	Commitment to engage with stakeholders	1	<p>The individual elements of the assessment are met or not as follows: Score 1</p> <ul style="list-style-type: none"> <li>• Met: Regular stakeholder engagement: The Company Puma (part of the Kering Group) launched a training programme on women's empowerment with its partner ILO Better Work, aimed at two of their key suppliers in Bangladesh. The programme will be extended to other sourcing countries. In relation to safety,</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			PUMA takes part in working groups 'alongside other players in the sector to improve road safety for employees going and coming from work (especially in Cambodia). The Company provides other examples of site-stakeholder engagement. [Reference document 2017, 2017: <a href="http://kering.com">kering.com</a> ] Score 2 <ul style="list-style-type: none"> <li>• Not met: Commits to engage stakeholders in design</li> <li>• Not met: Regular stakeholder design engagement</li> </ul>
A.1.5	Commitment to remedy	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Commits to remedy</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Not obstructing access to other remedies</li> <li>• Not met: Collaborating with other remedy initiatives</li> <li>• Not met: Work with AP suppliers to remedy impacts</li> </ul>
A.1.6	Commitment to respect the rights of human rights defenders	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Zero tolerance attacks on HRs Defenders (HRDs): Although the Company commits to no retaliate against employees that report complaints in good faith, no evidence found of a Company-wide commitment to not intimidate/retaliate against any individual who acts a defender of human rights (any person who raises questions about the Company's activities). [Code of ethics, 2013: <a href="http://kering.com">kering.com</a> &amp; Sustainability principles: <a href="http://kering.com">kering.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Expects AP suppliers to reflect company HRD commitments: Although the Company commits in the context of the supply chain to require not retaliation against worker representatives or any personnel engaged in organising workers, no evidence found of a commitment to do so against any individual who acts a defender of human rights (any person who raises questions about the Company's activities). [Sustainability principles: <a href="http://kering.com">kering.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	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Met: CEO or Board approves policy: The CEO writes the preface of the code of ethics and is signed by him. [Code of ethics, 2013: <a href="http://kering.com">kering.com</a>]</li> <li>• Met: Board level responsibility for HRs: he Sustainability Committee provides advice on an guides the Group's sustainability strategy. The sustainability strategy has three pillars, being one of the social pillar, which has the aim of promoting well-being at work and the protection of employees inside and outside the group. The effective implementation of the strategy includes working to respect human rights in the supply chain. [Reference document 2017, 2017: <a href="http://kering.com">kering.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Speeches/letters by Board members or CEO: The Company discloses a presentation of the general ordinary meeting which includes a sustainability bit explained by the Chief Sustainability officer, which is an executive officer. There is a document containing the minutes of the meeting (however it is in French). The Company also discloses a sustainability strategy document. No evidence found, however, of a speech or presentation by the CEO or board member containing details on the company's approach to human rights or discussing its importance.</li> </ul>
A.2.2	Board discussions	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Board/Committee review of salient HRs: Although the Company discloses information on different committees, such as the ethics committees and the due diligence steering committee, no evidence found of the process to address human rights issues at Board level, including board level committees. No information found on the process followed by the Sustainability Committee (Board level committee) for discussing issues, particularly human rights, or examples of human rights issues discussed by the Committee. [Reference document 2017, 2017: <a href="http://kering.com">kering.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Examples or trends re HR discussion</li> <li>• Not met: Both examples and process</li> </ul>
A.2.3	Incentives and performance management	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Met: Incentives for at least one board member: 10% of the variable remuneration of the Chairman &amp; CEO, and the Managing Director depended on Corporate Social responsibility and another 10% in Sustainability. The</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Sustainability target, contained 5 basis for the assessment, being one of them the introduction or the Kering Standards for raw materials and manufacturing processes. This Kering Standard documents contains the requirements in terms of human rights for the supply chain. [Reference document 2017, 2017: <a href="http://kering.com">kering.com</a>]</p> <ul style="list-style-type: none"> <li>• Not met: At least one key AP HR risk, beyond employee H&amp;S: The target is linked to the introduction of a policy and not to achieve good performance in a specific human right issue for the Company</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Performance criteria made public: 30% of the annual remuneration of the Chairman &amp; CEO is linked to non-financial performance. 10% for each of: organisations and talent management, corporate social responsibility, and sustainability. The Company discloses the total amount paid to the Chairman &amp; CEO for meeting both financial and non-financial targets. As indicated above, one of the basis for the assessment of the sustainability targets was the introduction of the 'Standards for raw materials and manufacturing processes', which contains the Company's audit requirements for supply chain, including human rights. [Reference document 2017, 2017: <a href="http://kering.com">kering.com</a>]</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	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: Senior responsibility fo HR (inc ILO): Kering's sustainability department defines the strategy and policies and supports the Group's brands. More than 15 specialists that report to the Chief Sustainability Officer. A dedicated team has also been established with the task of managing supply chain, logistics and industrial operations on behalf of the Group's Luxury brands. The ethics structure is also managed by the Chief Sustainability Officer and Head of International Affairs. [Reference document 2017, 2017: <a href="http://kering.com">kering.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Day-to-day responsibility: As indicated above, Kering's sustainability department, composed of more than 15 specialist who report to the Chief Sustainability Officer, defines strategy and policies and supports the Group's brands with the implementation of the Group's sustainability strategy by systematically looking for potential synergies and improvement. Also, each brand has at least one Sustainability lead and for the larger brands, entire sustainability teams. As a result, Kering's sustainability team numbers more than 60 people (sustainability includes human rights). The ethics organization is also explained. It supervises the circulation and applications of the code of ethics and responds questions and complaints submitted. [Reference document 2017, 2017: <a href="http://kering.com">kering.com</a>]</li> <li>• Not met: Day-to-day responsibility in supply chain: To Reference document indicates that the Company has two different organisations to manage the two different market segment. For the Luxury brands, it has been established a single central body allowing Kering to control the compliance of its Luxury brands' suppliers. This central body is composed of a team of 16 people (12 auditors specialised in conducting supplier audits and monitoring anomalies and 4 people dedicated to risk management, control procedures and management of information support systems)'. Depending on the needs they can be assisted by an external service provider. However, the Company does not indicate how day-to-day responsibility in supply chain is allocated for the brands in the other segment. [Reference document 2017, 2017: <a href="http://kering.com">kering.com</a>]</li> </ul>
B.1.2	Incentives and performance management	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: Senior manager incentives for human rights: 10% of the variable remuneration of the Managing Director (executive committee level) depended on Corporate Social responsibility and another 10% in Sustainability. The Sustainability target contained 5 basis for the assessment, being one of them the introduction or the Kering Standards for raw materials and manufacturing processes. This Kering Standard documents contains the requirements in terms of human rights for the supply chain. [Reference document 2017, 2017: <a href="http://kering.com">kering.com</a>]</li> <li>• Not met: At least one key AP HR risk, beyond employee H&amp;S: The target is linked to the introduction of a policy and not to achieve good performance in a specific human right issue for the Company. [Reference document 2017, 2017: <a href="http://kering.com">kering.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Performance criteria made public: 30% of the annual remuneration of the Managing Director (executive committee) is linked to non-financial performance. 10% for each of: organisations and talent management, corporate social responsibility, and sustainability. The Company discloses the total amount paid to the Managing Director for meeting both financial and non-financial targets. As indicated above, one of the basis for the assessment of the sustainability targets was the introduction of the 'Standards for raw materials and manufacturing processes', which contains the Company's audit requirements for supply chain, including human rights. [Reference document 2017, 2017: <a href="http://kering.com">kering.com</a>]</li> </ul>
B.1.3	Integration with enterprise risk management	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: HR part of enterprise risk system: Following the French Law on the Duty of Care, the Company has to create a vigilance plan that includes assessment to identify, analyse and categorise risk, procedures to evaluate affiliates and suppliers, and actions to attenuate risk. Risks include human rights (including health and safety). The monitoring of the compliance with the Law of the Duty of care is carried out by a steering committee that includes members from the Compliance and internal audit departments, and the assessment of risks must be re-evaluated each year, so we can imply this is part of the Company's risk management systems. [Reference document 2017, 2017: <a href="http://kering.com">kering.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Audit Ctte or independent risk assessment</li> </ul>
B.1.4.a	Communication /dissemination of policy commitment(s) within Company's own 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: Communicates its policy to all workers in own operations: The Company has indicated that 'The Code of ethics is available in the 12 most widely spoken languages in the Group on the Group's intranet, and on Kering's website for readers from outside the Group'. The code indicates that the Group's rules 'reflect' several international standards including International Labour Organisation Conventions and the Global Compact. The Company communicates the code through training to all employees, which depending on the year, includes human rights issues. [Reference document 2017, 2017: <a href="http://kering.com">kering.com</a> &amp; Code of ethics, 2013: <a href="http://kering.com">kering.com</a>]</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	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: Steps to communicate policy commitments to BRs: The Company indicates in its Sustainability principles (which cover all ILO core) that 'in terms of scope, all of Kering and its brands' suppliers are required to comply with these Principles, and attest that their respective supply chains do likewise. This encompasses our suppliers and all of their sub-suppliers, including suppliers of materials, production materials, packaging and services used in the production or performance of activities on behalf of Kering and its Brands, and any personnel acting for and/or on behalf of the supplier and its sub-suppliers. The Reference document states that 'Kering also redrafted contracts based on a Group template to be signed by its direct suppliers. These newly formulated contracts ensure a higher level of protection against corruption and extend the Group's Code of Ethics and Sustainability Principles to its entire supply chain'.</li> </ul> <p>In 'sport &amp; lifestyle' activities, Puma and Volcom have their own policies and standards, which cover all ILO, although no details found specifically on communication of these, as indicated above, the Sustainability principles refer to the entire supply chain. [Sustainability principles: <a href="http://kering.com">kering.com</a> &amp; Reference document 2017, 2017: <a href="http://kering.com">kering.com</a>]</p> <ul style="list-style-type: none"> <li>• Met: Including to AP suppliers: See above [Sustainability principles: <a href="http://kering.com">kering.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: How HR commitments made binding/contractual: In the case of luxury brands management, 'sustainability principles have been phased into supplier contracts since 2016. Each supplier is in turn tasked with imposing these principles on its own subcontractor network, if they have any'. The Company also states that it has 'redrafted contracts based on a Group template to be signed by its direct suppliers. These newly formulated contracts ensure a higher level of protection against corruption and extend the Group's Code of Ethics and Sustainability Principles to its entire supply chain' [Reference document 2017, 2017: <a href="http://kering.com">kering.com</a> &amp; Sustainability principles: <a href="http://kering.com">kering.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Met: Including on AP suppliers: As indicated above, suppliers are required to 'attest that their respective supply chains do likewise. This encompasses our suppliers and all of their sub-suppliers, including suppliers of materials, production materials, packaging and services used in the production or performance of activities on behalf of Kering and its Brands, and any personnel acting for and/or on behalf of the supplier and its sub-suppliers. [Reference document 2017, 2017: <a href="http://kering.com">kering.com</a> &amp; Sustainability principles: <a href="http://kering.com">kering.com</a>]</li> </ul>
B.1.5	Training on 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: Trains all workers on HR policy commitments: The Company carries out a mandatory ethical training module developed directly by the Group and updated annually. 'It is provided to all employees of all brands worldwide in nine languages'. Although in 2017 training topics are not related to human rights, the Company indicates that in 2015 'the programme covered topics related to diversity, corruption, respect for human rights and protection of the environment'. [Reference document 2017, 2017: <a href="http://kering.com">kering.com</a>]</li> <li>• Not met: Trains relevant managers including procurement: According to the Reference Document, training in the code of 2015 covered all employees worldwide. However, no evidence found of specific training for procurement managers. [Reference document 2017, 2017: <a href="http://kering.com">kering.com</a>]</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	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: Monitoring implementation of HR policy commitments: The Company's standards for raw materials and manufacturing processes contain descriptions on how the Company monitors its suppliers (although the document covers all type of activities carried out by both the company and suppliers, the audit process covering all ILOs refer to monitoring suppliers). [Kering Standards for Raw materials and manufacturing processes: <a href="http://kering.com">kering.com</a> &amp; Reference document 2017, 2017: <a href="http://kering.com">kering.com</a>]</li> <li>• Met: Monitoring AP suppliers: The Company's standards for raw materials and manufacturing processes contain descriptions on how the Company monitors its suppliers (although the document covers all type of activities carried out by both the company and suppliers, the audit process covering all ILOs refer to monitoring suppliers). This document includes types of audits and frequency, communication of audits, scope, methodology and areas to be checked. In addition, the Company's sustainability principles for suppliers also cover all ILO core areas. [Kering Standards for Raw materials and manufacturing processes: <a href="http://kering.com">kering.com</a> &amp; Sustainability principles: <a href="http://kering.com">kering.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Describes corrective action process: The Company describes in the Reference document the corrective action process to follow after audits find non-compliance for both 'Luxury' and 'sports &amp; lifestyle' management of supply chain. However, although the Company provides some figures and percentage of type of non-compliance, no evidence found on the numbers of incidence (or number of times that the corrective action process was necessary). [Kering Standards for Raw materials and manufacturing processes: <a href="http://kering.com">kering.com</a> &amp; Reference document 2017, 2017: <a href="http://kering.com">kering.com</a>]</li> <li>• Not met: Example of corrective action: Although the Company reports on how it manages complaints, the example for corrective action refers to a case of example in which the corrective action process is activated and how it follows up in practice. [Reference document 2017, 2017: <a href="http://kering.com">kering.com</a>]</li> <li>• Not met: Discloses % of supply chain monitored: The Company discloses the number of audits carried out, but no evidence found on the proportion of the supply chain monitored</li> </ul>
B.1.7	Engaging business relationships	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: HR affects selection of suppliers: The detailed standards followed by the Company indicate that there is a global audit is performed during the activation (before a supplier can start working with a Kering brand). Sustainability principles have been phased into supplier contracts since 2016 [Reference document 2017, 2017: <a href="http://kering.com">kering.com</a> &amp; Kering Standards for Raw materials and manufacturing processes: <a href="http://kering.com">kering.com</a>]</li> <li>• Met: HR affects on-going supplier relationships: Depending on the results of the audits, the Company obtains different rating levels (each 'Luxury' and 'Sport &amp; lifestyle' have their own levels). The Standards for manufacturing processes contain the types of non-conformity, the follow-up audit time frame. If a company</li> </ul>



Indicator Code	Indicator name	Score (out of 2)	Explanation
			falls within a zero tolerance conformity, there is a termination on the relationship. [Kering Standards for Raw materials and manufacturing processes: <a href="http://kering.com">kering.com</a> ] Score 2 <ul style="list-style-type: none"> <li>• Met: Both requirement under score 1 met: See above</li> <li>• Met: Working with suppliers to improve performance: The Company indicates that 'training and raising the awareness of suppliers, and helping them adopt best practices is the preferred avenue taken by the Group and its brands to achieve tangible improvement practices across their value chains'. In this context it states that it acts at several levels, as a Group and within each of its brands, individually or collectively. Examples include meeting with suppliers to present sustainability strategy, the Kering supply and productions standards, offering vocational training courses and apprenticeships in the leather goods sector for refugees in Italy (Gucci), working with the Turkish employment ministry on the recruitment of Syrian refugees by suppliers (Puma), engagement programme and training courses including combating modern slavery, productivity improvement and remuneration levels (Stella McCartney). [Reference document 2017, 2017: <a href="http://kering.com">kering.com</a>]</li> </ul>
B.1.8	Approach to engagement with potentially affected stakeholders	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Stakeholder process or systems: The Company explains how it identifies cotton as an issue that needs special attention, and explains how it works to improve performance in quantity and quality through programmes and participation in initiatives to work with suppliers, including a social module for community education in the fight against child labour, women empowerment and right to education and safety. However, the current evidence seems to focus in dealing with an identified issue (especially on its environmental side) rather than active dialogue with affected stakeholders. No evidence found on how it engages in dialogue on a regular basis with specific stakeholders and/or organisations representing them, including issues of dialogue (human rights). [Reference document 2017, 2017: <a href="http://kering.com">kering.com</a> &amp; Kering Standards for Raw materials and manufacturing processes: <a href="http://kering.com">kering.com</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> Score 2 <ul style="list-style-type: none"> <li>• Not met: Analysis of stakeholder views and company's actions on them</li> </ul>

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.1	Identifying: Processes and triggers for identifying human rights risks and impacts	1.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Met: Identifying risks in own operations: The Company has started to apply the French 'Law on the Duty of Care', which seeks to prevent abuses on human and fundamental rights, health, etc. As part of this Law, companies must create a plan that includes an assessment to identify, analyse and categorise risks. The Company identified inherent risks (gross risks), mitigation tools, and residual risks (those that remain after mitigation controls are applied). The Company started this process during 2017 and 'Kering first identified the inherent risks of its supply chain', starting with the raw materials purchase. It says that Given that Sport &amp; Lifestyle's segment entities have more experience confronting potential violations of the duty of care, it has decided 'to focus its initial risk mapping efforts on developing a vigilance plan for its Luxury brands during the first year of the Law's application'. [Reference document 2017, 2017: <a href="http://kering.com">kering.com</a>]</li> <li>• Met: Identifying risks in AP suppliers: See above</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Met: Ongoing global risk identification: As indicated above, this is an ongoing process started in 2017 and to be continued in the future to cover other company's operations. [Reference document 2017, 2017: <a href="http://kering.com">kering.com</a>]</li> <li>• Not met: In consultation with stakeholders</li> <li>• Not met: In consultation with HR experts</li> <li>• Met: Triggered by new circumstances: The Company indicates that 'assessment of risks must be re-evaluated each year in light of potential changes to the Group's supply chain and to the relevant internal documents and literature'. In this context it is being considered that the mapping process involves both identification and assessment of risks. [Reference document 2017, 2017: <a href="http://kering.com">kering.com</a>]</li> </ul>
B.2.2	Assessing: Assessment of risks and	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Salient risk assessment (and context): The Company indicates that, each inherent risk identified during the mapping is given 'a number value to reflect</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
	impacts identified (salient risks and key industry risks)		<p>the level of potential risk in the absence of mitigation measures'. It also indicates that the assessment of risk must be reevaluated each year in light of potential changes to the supply chain and to relevant documents and literature</p> <p>However, the Company explains this procedure regarding raw materials purchased in the production of finished products, and does not seem to refer to manufacturing supply chain. Also, no evidence found of the process for assessing risks including geographical, economic and social factors. [Reference document 2017, 2017: <a href="http://kering.com">kering.com</a>]</p> <ul style="list-style-type: none"> <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	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Action Plans to mitigate risks: The use of mitigation tools are assessed in terms of their effectiveness. These tools were identified through interviews with Kering personnel and comments both internal (managements systems and manuals) and external to the public (Kering's policies and reports). The Company indicates that it has adopted an action plan for 2018 which proposes four items to mitigate risks from suppliers. It includes the code of ethics, the compliance manual (will set out definitions, practical case studies and recommendations to guide employee behaviour and to ensure their understanding of the possible violations, being one of them human rights), the alert system to report potential misconducts, and a management system created in 2015 which purpose is to create best practices, monitor risk assessments and provide supply chain analysis for Luxury activities. Finally, the Company has formulated contracts with suppliers to extend the code of ethics and sustainability principles to the entire supply chain. However, these tools seem to refer to compliance monitoring with the Company's policies, and not a system to prevent or mitigate the specific salient issues identified as consequence of the risk assessment (how the company has a system to act on in relation to the human rights salient issues identified and assessed in b.2.1 and b.2.2). [Reference document 2017, 2017: <a href="http://kering.com">kering.com</a>]</li> <li>• Not met: Example of Actions decided</li> <li>• Not 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	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: System to check if Actions are effective</li> <li>• Not met: Lessons learnt from checking effectiveness</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both requirement under score 1 met</li> </ul>
B.2.5	Communicating : Accounting for how human rights impacts are addressed	0.5	<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: Comms plan re identifying risks: Following the approval of the French Law on the Duty of Care, the Company has started a process, described in the reference document, to identify and map its risks related to human rights. The company provides some details about how it is going in the process (process to identify the risks and evaluate them). [Reference document 2017, 2017: <a href="http://kering.com">kering.com</a>]</li> <li>• Not met: Comms plan re assessing risks: Although the Company explains that it starting to map risks and how it goes about it, no evidence found on details on some contextual discrimination (hot it takes into account social, geographical or other factors), nor which are the salient human rights issues identified and assessed as relevant for its operations. [Reference document 2017, 2017: <a href="http://kering.com">kering.com</a>]</li> <li>• Not met: Comms plan re action plans for risks: Although the Company reports on its monitoring tools and how it has system to manage compliance with its policies, no evidence found on a system to take specific steps to tackle specific human rights issues identified during the identification and assessment process. [Reference document 2017, 2017: <a href="http://kering.com">kering.com</a>]</li> <li>• Not met: Comms plan re reviewing action plans</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 code of ethics indicates that 'any employee may also choose to make direct contact with the worldwide Ethics hotline, set up to register and record issues referred to them and to pass them on to the Ethics Committee(s) concerned'. The hotline is available to all worldwide. [Code of ethics, 2013: <a href="http://kering.com">kering.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Number grievances filed, addressed or resolved: The Company indicates that they received 35 complaints in 2017, although it is not clear what topics they refer to. Five of the 35 complaints resulted in violations of the code, but it is not clear whether any of them were related to human rights issues. [Reference document 2017, 2017: <a href="http://kering.com">kering.com</a>]</li> <li>• Met: Channel is available in all appropriate languages: This hotline handles calls from employees in all the languages into which the Code is translated (English, French, Italian, German, Spanish, Dutch, Russian, Portuguese, Chinese, Japanese and Korean)'. [Code of ethics, 2013: <a href="http://kering.com">kering.com</a>]</li> <li>• Not met: Expect AP supplier to have equivalent grievance systems</li> <li>• Not met: Opens own system to AP supplier workers: The Company indicates that 'from 2018, access to this hotline will no longer be limited to employees of the Group'. However, it is not clear if the Company has communicated in any public document that suppliers and/or other external parties have access to the channel at this time. [Reference document 2017, 2017: <a href="http://kering.com">kering.com</a>]</li> </ul>
C.2	Grievance channel(s)/mechanism(s) to receive complaints or concerns from external individuals and communities	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: Grievance mechanism for community: The Company indicates that 'from 2018, access to this hotline will no longer be limited to employees of the Group'. However, it is not clear if the Company has communicated in any public document that external parties including communities have access to the channel at this time. [Reference document 2017, 2017: <a href="http://kering.com">kering.com</a> &amp; Code of ethics, 2013: <a href="http://kering.com">kering.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Describes accessibility and local languages</li> <li>• Not met: Expects AP supplier to have community grievance systems</li> <li>• Not met: AP supplier communities use global system</li> </ul>
C.3	Users are involved in the design and performance of the channel(s)/mechanism(s)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Engages users to create or assess system</li> <li>• Not met: Description of how they do this</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Engages with users on system performance</li> <li>• Not met: Provides user engagement example on performance</li> <li>• Not met: AP suppliers consult users in creation or assessment</li> </ul>
C.4	Procedures related to the mechanism(s)/channel(s) are publicly available and explained	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Response timescales: The Group Ethics Committee, or the two regional ethics Committees, Asia-Pacific Ethics Committee or the Americas Ethics Committee, respond to enquiries from any Group employee, from a straightforward request for clarification or question about the interpretation of the Code and its implementation, to a complaint put before the Committee for presumed non-compliance with one of the Group's ethical principles. [Code of ethics, 2013: <a href="http://kering.com">kering.com</a>]</li> <li>• Not met: How complainants will be informed</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Escalation to senior/independent level</li> </ul>
C.5	Commitment to non-retaliation over complaints or concerns made	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: Public statement prohibiting retaliation: The code states that 'the Ethics Committees make sure that no action is taken against an employee who, in all good faith, reports a case of failure to comply with an ethical principle of the Code, as a consequence of having reported the matter.' However, it is not clear if this commitment is made extensive to external stakeholders. [Code of ethics, 2013: <a href="http://kering.com">kering.com</a>]</li> <li>• Not met: Practical measures to prevent retaliation: it does not describe how it ensures there is no retaliation (the code of ethics indicates that 'committees do not deal with anonymous requests, except when required to do so by relevant legal</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			obligation) against employees and any other stakeholder. [Code of ethics, 2013: <a href="http://kering.com">kering.com</a> ] Score 2 <ul style="list-style-type: none"> <li>• Not met: Has not retaliated in practice</li> <li>• Not met: Expects AG suppliers to prohibit retaliation: The Company's sustainability principles for suppliers contain a commitment to no-retaliation for workers and any personnel engaged in organising workers. However, no evidence found of this requirement being extensive to any worker reporting complaints. [Sustainability principles: <a href="http://kering.com">kering.com</a>]</li> </ul>
C.6	Company involvement with State-based judicial and non-judicial grievance mechanisms	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Won't impede state based mechanisms</li> <li>• Not met: Complainants not asked to waive rights</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Will work with state based or non judicial mechanisms</li> <li>• Not met: Example of issue resolved (if applicable)</li> </ul>
C.7	Remedying adverse impacts and incorporating lessons learned	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Describes how remedy has been provided</li> <li>• Not met: Says how it would remedy key sector risks</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Changes introduced to stop repetition</li> <li>• Not met: Approach to learning from incident to prevent future impacts</li> <li>• Not met: Evaluation of the channel/mechanism</li> </ul>

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.2.1.b	Living wage (in the supply chain)	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Met: Living wage in supplier code or contracts: The Sustainability principles for suppliers require that 'the supplier and its sub-suppliers must respect employees' rights to a living wage that guarantees that the salary paid for a standard working week meets or exceeds legal standards or minimum wage standards relevant to the section and that is sufficient to satisfy the employee's basic needs as well as providing discretionary income'. [Sustainability principles: <a href="http://kering.com">kering.com</a>]</li> <li>• Not met: Improving living wage practices of suppliers: Although the Reference document indicates that, since 2015, PUMA is working with the FLA to 'implement a national minimum wage policy in Georgia with local Stakeholders'. [Reference document 2017, 2017: <a href="http://kering.com">kering.com</a>]</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.2.2	Aligning purchasing decisions with human rights	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Met: Avoids business model pressure on HRs: The Company shows evidence in the context of indirect purchasing (non-retail). In this context, the Company has a sustainable purchasing policy (which focuses in sustainability commitments for indirect suppliers rather than in company's practices to avoid business considerations undermining human rights). It also indicates that the 'charter for responsible supplier relations' aims to 'develop ethical and sustainable relationships with supplier by promoting financial fairness and suppliers risk management and developing sustainable purchasing practices. This charter was drawn up by the French Credit Mediation Department and the French Purchasing association. It was signed by the Company in 2014 and 'sets out the Group's commitment'. This Charter applies especially in cases of SMEs (In France) and includes commitments like developing 'forward management of purchasing to give suppliers visibility by notifying them in advance of discontinuations of orders and medium and long term business level forecasts, thereby fostering the adjustment of capacities' and 'refraining, as far as possible from suddenly bringing operations back in-house in periods of crisis, and to be attentive to maintaining the subcontracting capacities and expertise required in recovery and growth periods'. Policies have been distributed and applied by all Group employees to manage purchasing ethically and responsibly. [Sustainable purchasing policy - Indirect purchasing, 02/2014: <a href="http://kering.com">kering.com</a> &amp; Charter for responsible supplier relations: <a href="http://kering.com">kering.com</a>]</li> </ul> <ul style="list-style-type: none"> <li>• Not met: Positive incentives to respect human rights</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			Score 2 • Not met: Both requirements under score 1 met
D.2.3	Mapping and disclosing the supply chain	1	The individual elements of the assessment are met or not as follows: Score 1 • Met: Identifies suppliers back to product source (farm, ranch etc): The Company carries out a project called 'Environmental Profit& Loss' (EP&L) to measure the environmental impact of all operation 'including both within its own operations and across all of its supply chains' and has a reporting covering these impacts. As it indicates in the disclosure made to 'Know the Chain: 'As part of the EP&L we have surveyed over 1,000 of our key suppliers, across 5 continents, from product assembly through to raw materials producers, including silk farms, textile factories, sheep farms and tanneries. The EP&L has significantly increased the level of traceability for key raw materials as well as the knowledge of the supply chain, from direct supplier up to raw material producers'. [EP&L report 2016, 2016: <a href="http://kering.com">kering.com</a> & Know the chain (2016): <a href="http://business-humanrights.org">business-humanrights.org</a> ] Score 2 • Not met: Discloses significant parts of supply chain and why: The Company also indicates that PUMA discloses its suppliers map, however, it has not disclosed a mapping for the most significant parts of its supply chain (and explained how it has defined what are most significant). [Reference document 2017, 2017: <a href="http://kering.com">kering.com</a> ]
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 • Met: Child Labour rules in codes or contracts: The Kering Sustainability principles for suppliers contains guidelines against child labour, including remediation programmes (policies and programs for remediation of children found to be working in order to enable such children to attend and remain in school until no longer a child) and age verification (supplier and its sub-suppliers must ensure that age verification procedures are in place and only rely on official government identification documents and educational records'. Puma's code also contains requirements on child labour, remediation in case of child labour found, and ensuring adequate documentation proving legal age. [Sustainability principles: <a href="http://kering.com">kering.com</a> & PUMA sustainability handbook (social standards): <a href="http://about.puma.com">about.puma.com</a> ] • Not met: How working with suppliers on child labour: In a third party news website it is indicated that the Company joined an initiative carried out by Norway's wealth fund and Uniform to form a children's rights network which 'aims to look at broader issues that could be affected by companies and their products, such as standards of living, access to education, basic hygiene and pollution'. However, no details found in relation to the actual activities carried out by the Company within this context. [Third party website - News on Norway's wealth fund and children's rights network, 11/2017: <a href="http://reuters.com">reuters.com</a> ] Score 2 • Not met: Both requirements under score 1 met • Not met: Provide analysis of trends in progress made
D.2.5.b	Forced labour: Debt bondage and other unacceptable financial costs (in the supply chain)	1	The individual elements of the assessment are met or not as follows: Score 1 • Met: Debt and fees rules in codes or contracts: The sustainability principles for suppliers state that no use of forced labour 'is allowed and employees cannot be asked to pay "deposits" or fees or have their identification documents withheld. No portion of employees' salaries, indemnities, property or documents may be withheld with the purpose of forcing employees to continue their employment relationship with the firm. Employees are free to leave their employment relationship with reasonable notice as defined by governing law and prevailing industry practices'. Puma's code also contains guidelines on fees and salary advances which may result in any form of bonded labour. [Sustainability principles: <a href="http://kering.com">kering.com</a> & PUMA sustainability handbook (social standards): <a href="http://about.puma.com">about.puma.com</a> ] • Not met: How working with suppliers on debt & fees Score 2 • Not met: Both requirements under score 1 met • Not met: Provide analysis of trends in progress made

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.2.5.d	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"> <li>• Met: Free movement rules in codes or contracts: The sustainability principles for suppliers state that no use of forced labour 'is allowed and employees cannot be asked to pay "deposits" or fees or have their identification documents withheld. No portion of employees' salaries, indemnities, property or documents may be withheld with the purpose of forcing employees to continue their employment relationship with the firm. Employees are free to leave their employment relationship with reasonable notice as defined by governing law and prevailing industry practices'. Employees must be entitled to leave the workplace at the end of the standard working day or in case of medical or family emergencies and should be free to terminate their work contract by informing the supplier and/or its sub-suppliers within reasonable time'. Puma's requirement for suppliers also include guidelines on this topic, including freedom to leave factory during non-working hours, not retaining ID original documents, freedom to terminate employment, etc. [Sustainability principles: <a href="http://kering.com">kering.com</a> &amp; PUMA sustainability handbook (social standards): <a href="http://about.puma.com">about.puma.com</a>]</li> <li>• Not met: How these practices are implemented and monitored for agencies, labour brokers or recruiters</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.2.6.b	Freedom of association and collective bargaining (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>• Met: FoA &amp; CB rules in codes or contracts: The sustainability principles, which apply to 'all of Kering and its brands' suppliers' contain a commitment to freedom of association and collective bargaining. Guidelines also indicate that 'the supplier and its sub-suppliers must ensure that representatives of workers and any personnel engaged in organising workers are not subjected to discrimination, harassment, intimidation, or retaliation. Where the right to freedom of association and collective bargaining is restricted under law, the supplier and its sub-suppliers will facilitate, and not hinder, the development of parallel means for independent and free association and bargaining. Puma's sustainability handbooks contain guidelines about factories not restricting or limiting employees from organizing or joining workers organization and facilitate the selection of representatives. [Sustainability principles: <a href="http://kering.com">kering.com</a> &amp; PUMA sustainability handbook (social standards): <a href="http://about.puma.com">about.puma.com</a>]</li> <li>• Not met: How working with suppliers on FoA and CB</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.2.7.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"> <li>• Met: Sets out clear Health and Safety requirements: The Company's sustainability principles, which apply to all Kering's suppliers, contain requirements on safety, including accident risk assessment, provide workers with person Protection Equipment, regular training, access to clean toilet and potable water, adaption for employee medical conditions, etc. Puma has a specific handbook on occupational health and safety for suppliers. [Kering Standards for Raw materials and manufacturing processes: <a href="http://kering.com">kering.com</a> &amp; PUMA sustainability handbook (social standards): <a href="http://about.puma.com">about.puma.com</a>]</li> <li>• Not met: Injury rate disclosures</li> <li>• Not met: Lost days or near miss disclosures</li> <li>• Not met: Fatalities disclosures</li> </ul> <p>Score 2</p> <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.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: Puma's code contains requirements and guidelines regarding equal opportunities including hiring, promotion, benefits, work assignment and termination, and not using female labour for heavy or dangerous jobs or jobs which require contact with dangerous substances having harmful effects on the reproductive functions of women. The Company's sustainability principles, applying to all Kering's and its brands suppliers, contain the following commitment: 'there must not be any form of discrimination or preferential treatment in recruiting, remunerating, providing training, promoting, dismissing or in retirement nor on the basis of [...] gender. No evidence found, however, on guidelines to eliminate health and safety concerns that are particularly prevalent among women workers applying for suppliers company-wide (beyond Puma). [PUMA sustainability handbook (social standards): <a href="http://about.puma.com">about.puma.com</a>]</li> <li>Not met: How working with suppliers on women's rights: The Company indicates in the Reference document that it participates in the 'Business Action for Women initiative' in the context of the BSR network. This initiative, 'formed by 18 companies in the consumer goods sector alongside the Win-Win Strategies NGO with the aim of improving conditions for women in society. Kering's involvement here focuses primarily on the issues of women in the supply chain, the role of women in combating climate, and the eradication of violence against women'. However, no details found on specific activities carried out with suppliers to improve their practices in relation to women's rights. [Reference document 2017, 2017: <a href="http://kering.com">kering.com</a>]</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.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"> <li>Met: Working hours in codes or contracts: The Sustainability principles, which 'all of Kering and its brands' suppliers are required to comply', include requirements and guidelines on working hours: 'working hours must comply with national laws, collective agreements, and international conventions'. A standard working week should not exceed 48 hours. Employees must get at least one off day after six consecutive working days, all overtime shall be voluntary, not be used to replace regular employment, and compensated at a premium rate, etc. Puma's sustainability handbook also contains working hours requirements, including maximum working hours including overtime, at least one day off after six consecutive days of work, etc. [PUMA sustainability handbook (social standards): <a href="http://about.puma.com">about.puma.com</a> &amp; Sustainability principles: <a href="http://kering.com">kering.com</a>]</li> <li>Not met: How working with suppliers on working hours</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>

## 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 22.88 out of 80 points scored in themes A-D & F has been applied to produce a score of 5.72 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	2.6 out of 4	Out of a total of 40 indicators assessed under sections A-D of the benchmark, Kering made data public that met one or more elements of the methodology in 26 cases, leading to a disclosure score of 2.6 out of 4 points.
F.2	Recognised Reporting Initiatives	0 out of 2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 2</p> <ul style="list-style-type: none"> <li>Not met: Company reports on GRI: The Company discloses a cross reference table containing Grenelle II requirements, GRI indicators and the Global Compact. However, GRI indicators are reported indirectly, and not following a GRI index for reference. [Reference document 2017, 2017: <a href="http://kering.com">kering.com</a>]</li> <li>Not met: Company reports on SASB</li> <li>Not met: Company reports on UNGPRF</li> </ul>

Indicator Code	Indicator name	Score	Explanation
F.3	Key, High Quality Disclosures	0 out of 4	<p>Kering met 0 of the 8 thresholds listed below and therefore gets 0 out of 4 points for the high quality disclosure indicator.</p> <p>Specificity and use of concrete examples</p> <ul style="list-style-type: none"> <li>• Not met: Score 2 for A.2.2 : Board discussions</li> <li>• Not met: Score 2 for B.1.6 : Monitoring and corrective actions</li> <li>• Not met: Score 2 for C.1 : Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers</li> <li>• Not met: Score 2 for C.3 : Users are involved in the design and performance of the channel(s)/mechanism(s)</li> </ul> <p>Discussing challenges openly</p> <ul style="list-style-type: none"> <li>• Not met: Score 2 for B.2.4 : Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts</li> <li>• Not met: Score 2 for C.7 : Remedying adverse impacts and incorporating lessons learned</li> </ul> <p>Demonstrating a forward focus</p> <ul style="list-style-type: none"> <li>• Not met: Score 2 for A.2.3 : Incentives and performance management</li> <li>• Not met: Score 2 for B.1.2 : Incentives and performance management</li> </ul>

## Disclaimer

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

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

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