

**Company Name** Kering  
**Industry** Apparel (Supply Chain only)  
**Overall Score (\*)** 34.7 out of 100

Theme Score	Out of	For Theme
3.5	10	A. Governance and Policies
8.3	25	B. Embedding Respect and Human Rights Due Diligence
3.8	15	C. Remedies and Grievance Mechanisms
7.2	20	D. Performance: Company Human Rights Practices
6.9	20	E. Performance: Responses to Serious Allegations
5.0	10	F. Transparency

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

Please note also that the "Not met" labels in the Explanation boxes below do not necessarily mean that the company does not meet the requirements as they are described in the bullet point short text. Rather, it means that the analysts could not find information *in public sources* that met the requirements *as described in full* in the CHRB 2019 Methodology document. For example, a "Not met" under "General HRs Commitment", which is the first bullet point for indicator A.1.1, does not necessarily mean that the company does not have a general commitment to human rights. Rather, it means that the CHRB could not identify a public statement of policy in which the company commits to respecting human rights.

## Detailed assessment

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

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1.1	Commitment to respect human rights	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Met: UNGC principles 1 &amp; 2: The Company is a signatory to the UN Global Compact since 2008. [Code of Ethics, 2019: <a href="http://keringcorporate.dam.kering.com">keringcorporate.dam.kering.com</a> &amp; UNGC participant website, N/A: <a href="http://unglobalcompact.org">unglobalcompact.org</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Not met: UNGPs: The Company states in its 2019 Code of Ethics: 'The Group's ethical principles of business conduct aim to respect the following key international references: The United Nations Universal Declaration of Human Rights (...); The OECD Guidelines for Multinational Enterprises; (...); The UNGP (United Nations Guiding Principles on Business and Human Rights);' However, 'aim to respect' does not count as a formal commitment following CHRB wording criteria. [Code of Ethics, 2019: <a href="http://keringcorporate.dam.kering.com">keringcorporate.dam.kering.com</a>]</li> <li>Not met: OECD: See above [Code of Ethics, 2019: <a href="http://keringcorporate.dam.kering.com">keringcorporate.dam.kering.com</a>]</li> </ul>
A.1.2	Commitment to respect the human rights of workers	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Met: UNGC principles 3-6: The Company has been a signatory to the UN Global Compact since 2018. In the supplier's charter the Company discloses the following commitment: 'The Group moreover wishes to emphasize its defense of the 10 principles of the Global Compact, to which it has been a signatory since 2008.' [Code of Ethics, 2019: <a href="http://keringcorporate.dam.kering.com">keringcorporate.dam.kering.com</a> &amp; UNGC participant website, N/A: <a href="http://unglobalcompact.org">unglobalcompact.org</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Not met: Explicitly list ALL four ILO for AP suppliers: The suppliers' charter contains requirements regarding child labour, forced labour, discrimination, freedom of association and collective bargaining: in relation to these last two, the charter requires 'to respect employees' directly applicable right of representation and free speech, freedom of association and collective wage bargaining'. In addition, the sustainability principles (for suppliers) states that 'In the event that freedom of association and the right to bargain collectively become limited by law, the supplier and its actors must allow its workers to freely elect their own representatives'. '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'. However, it is not clear if the 'collective bargain' statement covers other working conditions beyond wages. [Sustainability principles: <a href="http://kering.com">kering.com</a> &amp; Code of Ethics, 2019: <a href="http://keringcorporate.dam.kering.com">keringcorporate.dam.kering.com</a>] Score 2</li> <li>• Not met: Explicit commitment to All four ILO Core: The Company's principles of business practices contained in the code of ethics, in relation to human rights state that: 'We ban child and forced labor'. 'We encourage freedom of expression for employees of the Group'. 'We encourage dialogue and respect the free exercise of unions' rights within the context of local laws and regulations'. However, given that the commitment to these last two is made 'within the context of local laws', it is not clear whether it is committed to respect these rights in all contexts and locations (i.e. alternative mechanisms for those countries where there are legal restrictions to the exercise of these rights). The Company also mentions International Labour Organisation conventions, including '87 and 98 (freedom of association, protection of the right to organize and collective bargaining)'. However, the Company's wording in relation to this is that it 'aims to respect' this international reference, which is not considered a formal statement of commitment according to CHRB wording criteria. Finally, the Company has a statement of commitment against discrimination. [Code of Ethics, 2019: <a href="http://keringcorporate.dam.kering.com">keringcorporate.dam.kering.com</a>]</li> <li>• Met: Respect H&amp;S of workers: The Company states 'We provide a working environment that respects human rights and labor laws, and complies with laws and regulations on the environment, health and safety in all the countries in which we operate.' [Code of Ethics, 2019: <a href="http://keringcorporate.dam.kering.com">keringcorporate.dam.kering.com</a>]</li> <li>• Met: H&amp;S applies to AP suppliers: In its 2019 Code of Ethics the Company has a 'Group Suppliers' Charter' where it states that suppliers must 'prohibit any type of work which, by its nature or the conditions in which it is carried out, is likely to compromise health, safety, integrity or morality (clean and safe premises, access to drinking water, sanitary facilities, etc.);' [Code of Ethics, 2019: <a href="http://keringcorporate.dam.kering.com">keringcorporate.dam.kering.com</a>]</li> <li>• Not met: working hours for workers: The Code of Ethics states 'To ensure that our employees maintain a good balance between their working lives and personal lives, and to promote the well-being of each individual at work, Kering seeks to facilitate a supportive working environment which is caring and productive. For this purpose, the Group implements policies and mechanisms to facilitate each individual's daily life, and improve the quality of life at work: remote working, parental leave, portal solution for best managing the work-life balance, psychological support service, wellness days, etc.' However, this is no evidence that the Company commits itself to respecting the ILO conventions on labour standards on working hours, or clarifying standard weekly hours, maximum working hours and minimum breaks. [Code of Ethics, 2019: <a href="http://keringcorporate.dam.kering.com">keringcorporate.dam.kering.com</a>]</li> <li>• Met: Working hours for AP suppliers: The suppliers' charter, included in the code of ethics, prohibits 'any behavior contrary to dignity and well-being at work, especially any practice contrary to labor regulations and in particular concerning remuneration and the right to a living wage, working hours (maximum working hours, breaks and rest periods) and working conditions'. The sustainability principles for suppliers state that 'a standard working week, except for overtime work, must be established by law; nevertheless, it should not exceed 48 hours per week'. Employees must get at least one off day after six consecutive working days'. 'Overtime must be voluntary and must not exceed 12 hours per week, or be required on a regular basis'. [Code of Ethics, 2019: <a href="http://keringcorporate.dam.kering.com">keringcorporate.dam.kering.com</a> &amp; Sustainability principles: <a href="http://kering.com">kering.com</a>]</li> </ul>
A.1.3.AP	Commitment to respect human rights particularly	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</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
	relevant to the industry (AP)		<p>companies in France to sign the Women's Empowerment Principles'. [Company website - Promote Diversity: <a href="http://kering.com">kering.com</a> &amp; Code of Ethics, 2019: <a href="http://keringcorporate.dam.kering.com">keringcorporate.dam.kering.com</a>]</p> <ul style="list-style-type: none"> <li>• Not met: Expecting suppliers to respect these rights: The Company requires to their suppliers to 'pay particular attention to categories of workers vulnerable to exploitation, in particular migrants, by guaranteeing them non-discriminatory recruitment and employment practices. Freedom of movement and remuneration, whilst ensuring they have a good understanding of their rights'. However, no formal statement of requirement to respect migrant worker's rights found. It also requires suppliers 'to treat all men and women equally, fairly and respectfully at work, paying particular attention to the eradication of all forms of intimidation, harassment, violence or unequal treatment, especially with regard to women's pay'. However, no particular requirement to respect women's rights found. [Sustainability principles: <a href="http://kering.com">kering.com</a> &amp; Code of Ethics, 2019: <a href="http://keringcorporate.dam.kering.com">keringcorporate.dam.kering.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <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: While the Company states in its 'Group Suppliers' Charter' that it requires its suppliers 'to prohibit any type of work which, by its nature or the conditions in which it is carried out, is likely to compromise health, safety, integrity or morality (clean and safe premises, access to drinking water, sanitary facilities, etc.);' no evidence of Company commitment was found in relation to respecting right to water (access to safe water). [Code of Ethics, 2019: <a href="http://keringcorporate.dam.kering.com">keringcorporate.dam.kering.com</a>]</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. In relation to water, not clear if it refers only to employees access to drinking water. Evidence looks for commitment to right to water, not compromising water access to other users in the vicinity. [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:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Regular stakeholder engagement: The Company reports engagement with worker unions in Europe. Also the Company carries out employee surveys 'intended for all employees at Kering and all of its Houses. It covers four aspects of quality of life at work: work organization and processes, working conditions and the work environment, communication and subjective factors. [Reference Document 2018, 24/04/2019: <a href="http://keringcorporate.dam.kering.com">keringcorporate.dam.kering.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Commits to engage stakeholders in design: In its 2019 Reference Document under the heading 'Respect for human rights and fundamental freedoms' the Company states 'As a sustainable, responsible Luxury Group, Kering must identify and manage human rights- related risks in its sphere of influence (operations and supply chain) as quickly and firmly as possible. By working in partnership with its suppliers and stakeholders and sharing best practices, Kering protects the reputation of the Group and its Houses and maintains the appeal of their creations.' However, no statement of commitment found to engage with affected stakeholders and/or their legitimate representatives in the development or monitoring of the human rights approach. [Reference Document 2018, 24/04/2019: <a href="http://keringcorporate.dam.kering.com">keringcorporate.dam.kering.com</a>]</li> <li>• Not met: Regular stakeholder design engagement: The Company reports stakeholder engagement including a number of organisations such as Sustainable Apparel Coalition, Textile Exchange, Business for Social Responsibility, etc. However, no evidence found of regular engagement with affected stakeholders in the development or monitoring of human rights approach (workers, their families, workers in supply chain, local communities, representatives, etc.) [Reference Document 2018, 24/04/2019: <a href="http://keringcorporate.dam.kering.com">keringcorporate.dam.kering.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1.5	Commitment to remedy	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Commits to remedy: In its 2019 Code of Ethics the Company states that they 'undertake to prevent and penalize any breach of the Group's Code of ethics, and to put in place all the corrective and remedial actions necessary'. Code of ethics includes human rights commitments and supplier's charter. However, we found no clear commitment to remedy HR impacts caused or contributed by the company necessary to award this indicator. [Code of Ethics, 2019: <a href="http://keringcorporate.dam.kering.com">keringcorporate.dam.kering.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Not obstructing access to other remedies [Code of Ethics, 2019: <a href="http://keringcorporate.dam.kering.com">keringcorporate.dam.kering.com</a>]</li> <li>• Not met: Collaborating with other remedy initiatives</li> <li>• Not met: Work with AP suppliers to remedy impacts: The Company states in its Reference Document 2018 'Identification of a zero- tolerance breach triggers the immediate establishment of a crisis unit bringing together the Kering audit team and the relevant House(s) to decide on the future of the relationship with the supplier: immediate shutdown of the approval process if the supplier is in the process of being activated but has not started working; and discussions about the possibility of remediation and support for the supplier or about the need to terminate the contractual relationship if the supplier is working on one or more orders.' However, no evidence found in relation to working with business relationships to remedy adverse impacts through the business relationship's own mechanisms or through collaborating with them in the development of third party non-judicial remedies. [Reference Document 2018, 24/04/2019: <a href="http://keringcorporate.dam.kering.com">keringcorporate.dam.kering.com</a>]</li> </ul>
A.1.6	Commitment to respect the rights of human rights defenders	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Zero tolerance attacks on HRs Defenders (HRDs): In its Code of Ethics 2019 the Company commits itself to not retaliate against employees, or any person, that report complaints in good faith. However, no evidence found of a general commitment to not tolerate nor contribute to threats or intimidation against human rights defenders in relation to its operations. [Code of Ethics, 2019: <a href="http://keringcorporate.dam.kering.com">keringcorporate.dam.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: 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	<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 CEO writes the preface of the code of ethics and is signed by him. [Code of Ethics, 2019: <a href="http://keringcorporate.dam.kering.com">keringcorporate.dam.kering.com</a>]</li> <li>• Met: Board level responsibility for HRs: The Sustainability Committee provides advice on an guides the Group's sustainability strategy. Sustainability includes human rights. [Reference Document 2018, 24/04/2019: <a href="http://keringcorporate.dam.kering.com">keringcorporate.dam.kering.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Speeches/letters by Board members or CEO: In its 2019 Code of Ethics the Chairman and Chief Executive Officer states that 'the Code of ethics powerfully reaffirms our commitment to respect for human rights, not only for all our employees, but also for all those who work in our supply chains and contribute to our value creation'. However, this is the only part related to human rights of a preface letter describing different aspects covered by the Code. [Code of Ethics, 2019: <a href="http://keringcorporate.dam.kering.com">keringcorporate.dam.kering.com</a>]</li> </ul>
A.2.2	Board discussions	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Board/Committee review of salient HRs: The Company states that it integrated 'Respect for human rights and fundamental freedoms' as part of its global risk management system. On page 367 the Company explains further 'Within the scope of the Group's risk management policy and in accordance with Kering's corporate governance, Kering's Executive Management created a "Kering</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>group Risk Committee". It goes then on to explain the organizational framework and three step risk management process, explaining that 'the Risk Committee's work is brought to the attention of the Audit Committee, which is informed of the Committee's internal rules and has access to the minutes of its meetings'- The Company also indicates that it 'takes a cross-functional approach to governance over human rights challenges', which involves a 'Board of Directors' Sustainability Committee, meeting twice a year to monitor progress on the Sustainability strategy and arbitrate on the decisions involved'. [Reference Document 2018, 24/04/2019: <a href="http://keringcorporate.dam.kering.com">keringcorporate.dam.kering.com</a>]</p> <ul style="list-style-type: none"> <li>• Not met: Examples or trends re HR discussion: No evidence found of specific human rights issues discussed at board level meetings [Reference Document 2018, 24/04/2019: <a href="http://keringcorporate.dam.kering.com">keringcorporate.dam.kering.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both examples and process</li> </ul>
A.2.3	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: Incentives for at least one board member: The Company states that 'Human rights considerations are also included in the annual performance evaluations of Group executives. Thirty percent of the variable remuneration of the Chairman and Chief Executive Officer and of the Group Managing Director is linked to fulfilment of non-financial goals concerning human rights and the operational roll-out of the 2025 Sustainability strategy'. [Reference Document 2018, 24/04/2019: <a href="http://keringcorporate.dam.kering.com">keringcorporate.dam.kering.com</a>]</li> <li>• Not met: At least one key AP HR risk, beyond employee H&amp;S: In 2018 report the Company states that one target related with 'Organization and talent management' is 'stronger succession plans for key positions, with an emphasis on the need to achieve gender parity in the talent pool within three years'. However, no details found about specific indicators. [Reference Document 2018, 24/04/2019: <a href="http://keringcorporate.dam.kering.com">keringcorporate.dam.kering.com</a>]</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 Managing Director for meeting both financial and non-financial targets. [Reference Document 2018, 24/04/2019: <a href="http://keringcorporate.dam.kering.com">keringcorporate.dam.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	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: Commits to ILO core conventions: See indicator A.1.2</li> <li>• Met: Senior responsibility for HR: 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. Includes human rights. [Reference Document 2018, 24/04/2019: <a href="http://keringcorporate.dam.kering.com">keringcorporate.dam.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 2018, 24/04/2019: <a href="http://keringcorporate.dam.kering.com">keringcorporate.dam.kering.com</a>]</li> </ul>



Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Met: Day-to-day responsibility for AP in supply chain: See above. In addition, the Company indicates that provides central management through a team of 18 people (ten auditors specialized in conducting supplier audits and monitoring anomalies, three people dedicated to management and five planners); depending on the needs (locations, workload, etc.), this team can be assisted by an external service provider. [Reference Document 2018, 24/04/2019: <a href="http://keringcorporate.dam.kering.com">keringcorporate.dam.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: The Company indicates that 'Human rights considerations are also included in the annual performance evaluations of Group executives. Thirty percent of the variable remuneration of the [...] and of the Group Managing Director is linked to fulfilment of non-financial goals concerning human rights and the operational roll-out of the 2025 Sustainability strategy. Variable remuneration for the Leadership Group, comprising the 250 Group executives, is also linked to fulfilment of non-financial goals' (although no further details found in relation to this last group). Sustainability strategy includes ensuring that high standards for raw materials and processes are implemented by all suppliers by 2025, 'which also raises the bar on [...] working conditions'. [Reference Document 2018, 24/04/2019: <a href="http://keringcorporate.dam.kering.com">keringcorporate.dam.kering.com</a>]</li> <li>• Not met: At least one key AP HR risk, beyond employee H&amp;S: In 2018 report the Company states that one target related with 'Organization and talent management' is 'stronger succession plans for key positions, with an emphasis on the need to achieve gender parity in the talent pool within three years'. However, it is not clear how this target is linked to aspects of human rights. [Reference Document 2018, 24/04/2019: <a href="http://keringcorporate.dam.kering.com">keringcorporate.dam.kering.com</a>]</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 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. [Reference Document 2018, 24/04/2019: <a href="http://keringcorporate.dam.kering.com">keringcorporate.dam.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 risks is integrated as part of enterprise risk system: In 2018, Kering integrated the risk 'Respect for human rights and fundamental freedoms' as part of its global risk management system. In addition the Company explains the organizational framework of risk management, the risk committee and risk managers. This Committee comprises the Group Managing Director, the Chief Financial Officer, the Head of the Legal Department, the Chief Audit Executive, the Head of the Security Department and the Risk Manager. [...] The Risk Committee's work is brought to the attention of the Audit Committee, which is informed of the Committee's internal rules and has access to the minutes of its meetings.' [Reference Document 2018, 24/04/2019: <a href="http://keringcorporate.dam.kering.com">keringcorporate.dam.kering.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Audit Ctte or independent risk assessment: The Company states 'Audit Committee: Under the responsibility of the Board of Directors, to which it regularly reports on these matters, the Kering Audit Committee comprises four members, three of whom are independent. It is in charge of monitoring: [...]• the effectiveness of internal control and risk management systems;' HR is part of the Company's risk management system. It also states that 'Kering's Audit Committee meets at least four times a year.' No evidence found, however, in relation to assessment of adequacy of ERM systems in managing human rights during last reporting year. [Reference Document 2018, 24/04/2019: <a href="http://keringcorporate.dam.kering.com">keringcorporate.dam.kering.com</a>]</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: Commits to ILO core conventions</li> <li>• Met: Communicates its policy to all workers in own operations: On the Company website 'Ethics and business conduct' the Company states that the Group's Code of ethics is available in 14 languages. Below that statement are the 14 links to those documents. 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 in 9 languages to all employees, which depending on the year, includes human rights issues. In addition the Company organises various global communication campaigns about</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>the group values and policies. [Reference Document 2018, 24/04/2019: <a href="http://keringcorporate.dam.kering.com">keringcorporate.dam.kering.com</a> &amp; Ethics and business conduct, 2019: <a href="http://kering.com">kering.com</a>]</p> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Commits to all 4 ILO core conventions: See A.1.2</li> <li>• Not met: Communication of policy commitments to stakeholder: No explicit mention of the ILO requirements found.</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>• Not met: Commits to all 4 ILO core conventions for suppliers: See A.1.2</li> <li>• Met: Requiring AP suppliers to communicate policy down the chain: 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 has also introduced a shared contract template that incorporates its Code of Ethics and Sustainability principles. Both documents are thus systematically issued to suppliers and form an integral part of their contractual relationship with Kering'. [Sustainability principles: <a href="http://kering.com">kering.com</a> &amp; Reference Document 2018, 24/04/2019: <a href="http://keringcorporate.dam.kering.com">keringcorporate.dam.kering.com</a>] <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: How HR commitments made binding/contractual: As indicated above, both code of ethics and sustainability principles are 'systematically issued to suppliers and form an integral part of their contractual relationship with Kering'. [Reference Document 2018, 24/04/2019: <a href="http://keringcorporate.dam.kering.com">keringcorporate.dam.kering.com</a> &amp; Sustainability principles: <a href="http://kering.com">kering.com</a>]</li> <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. [Sustainability principles: <a href="http://kering.com">kering.com</a>]</li> </ul> </li></ul>
B.1.5	Training on Human Rights	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: Scores at least 1 on A.1.2</li> <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. 'A training program on ethics and the related Code was established for all Group employees worldwide and has been implemented throughout Kering since 2014. Available in nine languages, it sets out the ethical ground rules in place at Kering, and presents case studies and ethical dilemmas that help employees ask themselves the right questions. 'Although in 2018 training topics were 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' .In its Code of Ethics the Company also states 'every year each employee in the Group must take the compulsory training course or courses on ethics developed for all employees of the Group worldwide.' [Reference Document 2018, 24/04/2019: <a href="http://keringcorporate.dam.kering.com">keringcorporate.dam.kering.com</a> &amp; Code of Ethics, 2019: <a href="http://keringcorporate.dam.kering.com">keringcorporate.dam.kering.com</a>]</li> <li>• Not met: Trains relevant AP managers including procurement: The Company indicates that a number of explanation and training sessions on Kering Standards were held, particularly for suppliers. 'To round out these training courses, Kering's Sustainability department worked in 2018 to develop an e-learning program presenting all of the Kering Standards' For each material or process, it explains the related environmental and social challenges, and then sets out the measures to be taken to ensure responsible sourcing. Scheduled for initial roll out in the Kering Fundamentals section of the Group's e-learning platform in 2019'. However, no specific details found in relation to these training covering human rights issues and training, at least, procurement managers. Also, it seems that at the date of the report, it is a plan and it has not yet been rolled out. [Reference Document 2018, 24/04/2019: <a href="http://keringcorporate.dam.kering.com">keringcorporate.dam.kering.com</a> &amp; Kering Standards for raw materials and manufacturing processes, 01/2019: <a href="http://keringcorporate.dam.kering.com">keringcorporate.dam.kering.com</a>] <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Score of 2 on A.1.2</li> <li>• Not met: Both requirements under score 1 met</li> </ul> </li></ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
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: Scores at least 1 on A.1.2</li> <li>• Met: Monitoring implementation of HR policy commitments: The Company states that to ensure commitments are actively 'taken up throughout the Group and Its Houses, Kering draws upon its Code of Ethics [...] and upon a compliance program with a robust organization and a precise system of management, promotion, transparency and metrics'. There are three Ethics Committees, A group Committee and two regional committees. Two of the focuses of these committees consists in generating proposals and updated to the code and on 'the implementation of appropriate behaviors and practices', and process ethical issues reported by employees. The Company describes indicators used to monitor compliance in relation to human rights and fundamental freedoms and health and safety, including reach of training on the code, number of complaints, SA8000 certification for internal (and outsourced) production processes, frequency and severity of accidents. [Reference Document 2018, 24/04/2019: <a href="http://keringcorporate.dam.kering.com">keringcorporate.dam.kering.com</a>]</li> <li>• Met: Monitoring AP suppliers: The Company discloses the number of audits carried out and gives evidence on the proportion of the supply chain monitored 'Within this portfolio of suppliers, 2,867 audits were conducted in 2018 (an increase of 18% compared with 2017), breaking down as 1,632 comprehensive audits and 1,235 follow- up audits. This means that 59% of suppliers were audited in 2018. Over the 2015- 2018 period, 81% of suppliers were audited. [...] These audits revealed 8,373 anomalies.' [Kering Standards for raw materials and manufacturing processes, 01/2019: <a href="http://keringcorporate.dam.kering.com">keringcorporate.dam.kering.com</a> &amp; Integrated report 2017, 08/2018: <a href="http://kering.com">kering.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Score of 2 on A.1.2</li> <li>• Met: Describes corrective action process: In the Standards for raw materials and manufacturing processes the Company describes the corrective action processes, including categories and type of non-compliances, follow up audit timeframes depending the type of violation/non-conformities found, and type of audit to be carried out in these cases. As indicated above, audits revealed 8,373 anomalies. The Company provides breakdown by level of severity and top five anomalies. [Kering Standards for raw materials and manufacturing processes, 01/2019: <a href="http://keringcorporate.dam.kering.com">keringcorporate.dam.kering.com</a> &amp; Reference Document 2018, 24/04/2019: <a href="http://keringcorporate.dam.kering.com">keringcorporate.dam.kering.com</a>]</li> <li>• Met: Example of corrective action: The Company reports on how it manages complaints and gives two examples of remediation: 'the Group Audit teams conducted a supplier audit in 2018 during which a zero- tolerance breach of employment conditions was recorded. The two cases relate to providing accommodation without a lease to employees and using dangerous chemicals at the workplace. In both cases problem and solution are stated. [Reference Document 2018, 24/04/2019: <a href="http://keringcorporate.dam.kering.com">keringcorporate.dam.kering.com</a>]</li> <li>• Met: Discloses % of AP supply chain monitored: As indicated above, the Company states that 'over the 2015-2018 period, 81% of suppliers were audited. [Reference Document 2018, 24/04/2019: <a href="http://keringcorporate.dam.kering.com">keringcorporate.dam.kering.com</a>]</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 AP 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, 2018: <a href="http://kering.com">kering.com</a> &amp; Kering Standards for raw materials and manufacturing processes, 01/2019: <a href="http://keringcorporate.dam.kering.com">keringcorporate.dam.kering.com</a>]</li> <li>• Met: HR affects on-going AP 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 falls within a zero tolerance conformity, there is a termination on the relationship. [Kering Standards for raw materials and manufacturing processes, 01/2019: <a href="http://keringcorporate.dam.kering.com">keringcorporate.dam.kering.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Both requirement under score 1 met: See above</li> <li>• Met: Working with AP 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</li> </ul>



Indicator Code	Indicator name	Score (out of 2)	Explanation
			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), engagement programme and training courses including combating modern slavery, productivity improvement and remuneration levels (Stella McCartney). [Reference document 2017, 2018: <a href="http://kering.com">kering.com</a> & Reference Document 2018, 24/04/2019: <a href="http://keringcorporate.dam.kering.com">keringcorporate.dam.kering.com</a> ]
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: In the 2018 Reference Document in the sections 'Stakeholder involvement' and 'Initiatives by the Houses' the Company lists which coalitions and organizations it belongs to. It also gives examples of initiatives in 2007, 2009 and 2018. However, no evidence found of how the company has identified affected and potentially affected stakeholders and engaged with them in the last two years or the frequency and triggers for engagement in human rights issues with them. The Company details stakeholder engagement on human rights, but in all cases seems to be in partnerships and initiatives rather than directly with affected stakeholders. [Reference Document 2018, 24/04/2019: <a href="http://keringcorporate.dam.kering.com">keringcorporate.dam.kering.com</a> &amp; Kering Standards for raw materials and manufacturing processes, 01/2019: <a href="http://keringcorporate.dam.kering.com">keringcorporate.dam.kering.com</a>]</li> <li>Not met: Frequency and triggers for engagement</li> <li>Not met: Workers in AP SC engaged</li> <li>Not met: Communities in the AP 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 indicates in Reference document 2018 that in 2014, called on the expertise of Business for Social Responsibility to update materiality analysis. There were 12 interviews internally and sent a questionnaire to over 100 external stakeholders (including trade unions, suppliers, NGOs, etc.). This work was 'a defining part' of the Sustainability strategy. It also indicates that 'to identify the main human rights challenges [...] in 2017 Kering analyzed its practices by comparing them to the UN Guiding Principles on Business and Human Rights. This survey enabled Kering to identify specific points for progress'. Following this analysis Kering took steps to 'identify and evaluate the risk of a breach of the principles set forth therein, especially as regards human rights and fundamental freedoms'. 'The materiality analysis carried out by the Group identified respect for human rights as one of the six strategic challenges'. [Reference Document 2018, 24/04/2019: <a href="http://keringcorporate.dam.kering.com">keringcorporate.dam.kering.com</a>]</li> <li>Met: Identifying risks in AP suppliers: 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'. In 2018 the Company's operations re-focused in luxury brands. [Reference document 2017, 2018: <a href="http://kering.com">kering.com</a> &amp; Reference Document 2018, 24/04/2019: <a href="http://keringcorporate.dam.kering.com">keringcorporate.dam.kering.com</a>]</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 2018, 24/04/2019: <a href="http://keringcorporate.dam.kering.com">keringcorporate.dam.kering.com</a> &amp; Reference document 2017, 2018: <a href="http://kering.com">kering.com</a>]</li> <li>Not met: In consultation with stakeholders: Although the Company indicates that it consulted with stakeholders in the materiality analysis, this took place in 2014. [Reference Document 2018, 24/04/2019: <a href="http://keringcorporate.dam.kering.com">keringcorporate.dam.kering.com</a>]</li> <li>Not met: In consultation with HR experts: Although the Company indicates that it 'called on the expertise of Business for Social Responsibility', this took place in 2014. [Reference Document 2018, 24/04/2019: <a href="http://keringcorporate.dam.kering.com">keringcorporate.dam.kering.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Met: Triggered by new circumstances: The Company indicates in Reference document 2017 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, 2018: <a href="http://kering.com">kering.com</a> &amp; Reference Document 2018, 24/04/2019: <a href="http://keringcorporate.dam.kering.com">keringcorporate.dam.kering.com</a>]</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): In 2018 Reference document the Company describes that analyzed its practices and then took steps 'to identify and evaluate the risk of a breach of the principles set forth therein, especially as regards human rights and fundamental freedoms'. It lists examples of human rights and fundamental freedoms. 'They are normally guaranteed on a national level by a country's constitution as well as on a supranational or international level. Violations of human rights and fundamental freedoms can occur at all levels of the supply chain and the production process'. The Company also indicates that "'respect for human rights and fundamental freedoms" was identified as one of the Group's principal risks. However, no evidence found in relation to how assessed the saliency of different human rights issues, including taken social, economical or geographical factors into account. [Reference Document 2018, 24/04/2019: <a href="http://keringcorporate.dam.kering.com">keringcorporate.dam.kering.com</a>]</li> <li>• Not met: Public disclosure of salient risks: Although the Company lists examples of human rights and 'respect for human rights and fundamental freedoms' has been identified as one of the Company's principal risks, no details found on which specific issues are salient. [Reference Document 2018, 24/04/2019: <a href="http://keringcorporate.dam.kering.com">keringcorporate.dam.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.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: The Company indicates in the 2017 Reference document 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. In 2018 Reference document it describes these tools and provides a number of indicators used to monitor group operations and supply chain. However, these describe practices to monitor compliance, rather than having systems to take action to prevent, mitigate or remediate different specific risks that are salient to the Company. [Reference document 2017, 2018: <a href="http://kering.com">kering.com</a> &amp; Reference Document 2018, 24/04/2019: <a href="http://keringcorporate.dam.kering.com">keringcorporate.dam.kering.com</a>]</li> <li>• Not met: Including in AP supply chain</li> <li>• Met: Example of Actions decided: Bottega Veneta 'runs an ambitious pilot project on equal access to career opportunities for women in the Italian luxury sector working together with 'Camera Nazionale della Moda Italiana'. In 2018 Kering carried out a risk and opportunity assessment on gender in supply chains, culminating in a ranking for actions in Italy. In particular, this work highlighted poor visibility on working conditions for women in luxury supply chains in Italy and came up with several ideas for remedial action. The plan for 2019 involves a data collection operation through surveys addressing a broad public, site visits, and working groups spanning employees, management teams and unions. This will be backed by regular communication campaigns throughout the project, to achieve wide exposure for key findings'. [Reference Document 2018, 24/04/2019: <a href="http://keringcorporate.dam.kering.com">keringcorporate.dam.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.2.4	Tracking: Monitoring and evaluating the effectiveness of actions to respond to	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: Although the Company describes its systems and tools, and how it monitors compliance and follows up different indicators, it seems to be related to compliance monitoring rather evaluating effectiveness of different actions taken to tackle different issues, which</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
	human rights risks and impacts		<p>is what this indicator looks for. [Reference Document 2018, 24/04/2019: <a href="http://keringcorporate.dam.kering.com">keringcorporate.dam.kering.com</a>]</p> <ul style="list-style-type: none"> <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). See B.2.1 [Reference Document 2018, 24/04/2019: <a href="http://keringcorporate.dam.kering.com">keringcorporate.dam.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 (not 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. See B.2.2 [Reference Document 2018, 24/04/2019: <a href="http://keringcorporate.dam.kering.com">keringcorporate.dam.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. The Company provides some examples of initiatives carried out in some of its business, that show examples of how it deals with particular issues. See B.2.3 [Reference Document 2018, 24/04/2019: <a href="http://keringcorporate.dam.kering.com">keringcorporate.dam.kering.com</a>]</li> <li>• Not met: Comms plan re reviewing action plans [Reference Document 2018, 24/04/2019: <a href="http://keringcorporate.dam.kering.com">keringcorporate.dam.kering.com</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: The Company reports a case of a jumper that caused offense, and how it decided to remove it from stores. Also it provides evidence of a community fund and scholarship program for North America Alongside Global Volunteering program. However, this does not seem to be related with human rights of affected stakeholders being impacted, as it seems to be considered a reaction of offense from the public due to a controversial product. [Twitter - Communication from Gucci over a product, 06/02/2019: <a href="https://twitter.com">twitter.com</a> &amp; Gucci Changemakers, 18/03/2019: <a href="http://equilibrium.gucci.com">equilibrium.gucci.com</a>]</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, 2019: <a href="http://keringcorporate.dam.kering.com">keringcorporate.dam.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 38 complaints in 2018, although it is not clear what topics they refer to. [Reference Document 2018, 24/04/2019: <a href="http://keringcorporate.dam.kering.com">keringcorporate.dam.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>• Met: Opens own system to AP supplier workers: Since January 2018, the hotline is open to 'external and temporary staff working for external partners or service providers under contract with the Group and/or its Houses. Issues may be reported directly [to the Ethics Committees] or by means of an ethics hotline'. [Reference Document 2018, 24/04/2019: <a href="http://keringcorporate.dam.kering.com">keringcorporate.dam.kering.com</a>]</li> </ul>
C.2	Grievance channel(s)/mechanism(s) to receive	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 the ethics hotline is open for 'external and temporary staff working for external partners or service providers under contract with the Group and/or its Houses'.</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
	complaints or concerns from external individuals and communities		<p>Issues may be reported directly to Ethics committee or through the hotline. However, it is not clear if grievance mechanisms are open and accessible to all external individuals and communities who may be adversely impacted by the Company. [Reference Document 2018, 24/04/2019: <a href="http://keringcorporate.dam.kering.com">keringcorporate.dam.kering.com</a> &amp; Code of Ethics, 2019: <a href="http://keringcorporate.dam.kering.com">keringcorporate.dam.kering.com</a>]</p> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Describes accessibility and local languages: The Company describe internet access, telephone access and language availability. However, as indicated above, no evidence found of channels being open for all stakeholders. [Code of Ethics, 2019: <a href="http://keringcorporate.dam.kering.com">keringcorporate.dam.kering.com</a>]</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	0.5	<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: Response timescales: The Code of ethics states that 'except in special cases, referrals are handled within a period of three months'. [Code of Ethics, 2019: <a href="http://keringcorporate.dam.kering.com">keringcorporate.dam.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	0.5	<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: Public statement prohibiting retaliation: The Code states that 'Anyone taking reprisals will be subject to disciplinary penalties. This means that even if the facts are not proven, a whistleblower acting in good faith will not have any cause for concern, and will be protected if he or she is subject to intimidation. As indicated in previous indicators, this channel is open to partners workers but is not clear if it is available for other stakeholders (and those that represent them). [Code of Ethics, 2019: <a href="http://keringcorporate.dam.kering.com">keringcorporate.dam.kering.com</a>]</li> <li>• Met: Practical measures to prevent retaliation: The code states that 'anyone taking reprisals (in the context of whistleblowing) will be subject to disciplinary practices. This means that even if the facts are not proven, a whistleblower acting in good faith will not have any cause for concern, and will be protected if he or she is subject to intimidation. The Company indicates in the Reference document that 'Kering's compliance officers also benefit from regular personalized training. [Code of Ethics, 2019: <a href="http://keringcorporate.dam.kering.com">keringcorporate.dam.kering.com</a> &amp; Reference Document 2018, 24/04/2019: <a href="http://keringcorporate.dam.kering.com">keringcorporate.dam.kering.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Has not retaliated in practice</li> <li>• Not met: Expects AP 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. In addition, although Company's systems are open to partners' workers, is not clear if it is available to suppliers' stakeholders. [Sustainability principles: <a href="http://kering.com">kering.com</a> &amp; Reference Document 2018, 24/04/2019: <a href="http://keringcorporate.dam.kering.com">keringcorporate.dam.kering.com</a>]</li> </ul>
C.6	Company involvement with State-based judicial and non-judicial grievance mechanisms	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Won't impede state based mechanisms: The Company provided documents to CHRB for this indicator. However, evidence was not material.</li> <li>• Not met: Complainants not asked to waive rights</li> </ul> <p>Score 2</p> <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	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: Describes how remedy has been provided: The Company reports in relation to the number of complaints, although it does not describe remedies provided. In</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
	incorporating lessons learned		<p>relation to remediation provided, it gives the example of a zero-tolerance breach form a supplier: 'This supplier had made accommodation available to its employees without a lease. In accordance with the procedure in place for this type of anomaly, a crisis unit was immediately set up with the relevant House. After analyzing the case, the supplier corrected the situation by providing proof that leases had been established'. [Reference Document 2018, 24/04/2019: <a href="http://keringcorporate.dam.kering.com">keringcorporate.dam.kering.com</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>

## 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)	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 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'. However, in order to meet this indicator, wages need to cover all needs of family or dependents. [Sustainability principles: <a href="http://kering.com">kering.com</a>]</li> <li>• Not met: Improving living wage practices of suppliers: The Company indicates that it 'works in partnership with BSR and the Fair Wage Network on expanding one of the main global databases on decent wages, for use as an operational decision-making tool in the industry. However, no details found in relation to work carried out with suppliers to improve their living wage practices. [Reference Document 2018, 24/04/2019: <a href="http://keringcorporate.dam.kering.com">keringcorporate.dam.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> <li>• Not met: Provide analysis of trends demonstrating progress</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 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> <li>• Not 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>



Indicator Code	Indicator name	Score (out of 2)	Explanation
D.2.3	Mapping and disclosing 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: Identifies suppliers back to product source: The Company developed a tool called 'Environmental Profit&amp; Loss' (EP&amp;L). EP&amp;L 'measures and values in economic terms the environmental impacts across our own operations and the entire supply chain'. As it indicates in the disclosure made to 'Know the Chain: 'As part of the EP&amp;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&amp;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&amp;L report 2018, 06/2019: <a href="http://keringcorporate.dam.kering.com">keringcorporate.dam.kering.com</a> &amp; Know the chain (2016): <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: Discloses significant parts of supply chain and why: The Company describes its supply chain and breakdown of suppliers by geographical location. It also has an interactive map that allows to check Company's impacts geographically. However, this indicator looks for lists of locations and addresses of suppliers representing the most significant parts of the Company (what the Company considers to be its most significant part). [Reference Document 2018, 24/04/2019: <a href="http://keringcorporate.dam.kering.com">keringcorporate.dam.kering.com</a> &amp; EP&amp;L report 2018, 06/2019: <a href="http://keringcorporate.dam.kering.com">keringcorporate.dam.kering.com</a>]</li> </ul>
D.2.4.b	Prohibition on child labour: Age verification and corrective actions (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: 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'. [Sustainability principles: <a href="http://kering.com">kering.com</a>]</li> <li>• 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. The Company also indicates that is a signatory to the Pledge Against Forced Child Labour in Uzbekistan Cotton. However, as indicated, no details found in relation to specific work carried out with suppliers. [Third party website - News on Norway's wealth fund and children's rights network, 11/2017: <a href="http://reuters.com">reuters.com</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 demonstrating progress</li> </ul>
D.2.5.b	Prohibition on forced labour: Debt bondage and other unacceptable financial costs (in the supply chain)	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• 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>]</li> <li>• Not met: How working with suppliers on debt &amp; fees: The Company describes in its Reference document participation in partnerships and initiatives, including, among others, Global Business Coalition Against Human Trafficking. However, no evidence found in relation to specific work carried out with suppliers to improve their practices in relation to the elimination of the imposition of financial burden on workers. [Reference Document 2018, 24/04/2019: <a href="http://keringcorporate.dam.kering.com">keringcorporate.dam.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> <li>• Not met: Provide analysis of trends in progress made</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.2.5.d	Prohibition on forced labour: Restrictions on workers (in the supply chain)	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <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>]</li> <li>• Not met: How these practices are implemented and monitored for agencies, labour brokers or recruiters: The Company describes in its Reference document participation in partnerships and initiatives, including, among others, Global Business Coalition Against Human Trafficking. However, no evidence found in relation to specific work carried out with suppliers to improve their practices in relation to the restriction of workers' mobility, including through the retention of documents against the workers will or workers' mean of accessing wages. [Reference Document 2018, 24/04/2019: <a href="http://keringcorporate.dam.kering.com">keringcorporate.dam.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> <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)	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: 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. However, following indicator A.1.2, commitment to Collective Bargaining seems to made in the context of wages. [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. [Sustainability principles: <a href="http://kering.com">kering.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: The Company has provided specific sources to CHRB for this indicator, however, they are not material, as don't refer to specific work carried out to improve suppliers' performance in relation to health and safety (injuries, fatalities and personal safety).</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)	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: Women's rights in codes or contracts: The suppliers' charter includes the requirement to 'treat all men and women equally, fairly and respectfully at work, paying particular attention to the eradication of all forms of intimidation, harassment, violence or unequal treatment, especially with regard to women's pay'. However, no evidence found of requirements of measures to ensure equal opportunities throughout all levels of employment and to eliminate health and safety concerns that are particularly prevalent among women workers'. [Code of Ethics, 2019: <a href="http://keringcorporate.dam.kering.com">keringcorporate.dam.kering.com</a>]</li> <li>• 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'. The Company describes that some of its brands 'are working with institutional partner Camera Nazionale della Moda Italiana (CNMI) and the NGO Valore D. [...] the project also seeks to develop women's talents in the luxury supply chain. During the initial diagnosis phase, in 2018, Kering carried out a risk and opportunity assessment on gender in supply chains, culminating in a ranking for actions in Italy. In particular, this work highlighted poor visibility on working conditions for women in luxury supply chains in Italy, and came up with several ideas for remedial action. The plan for 2019 involves a data collection operation through surveys addressing a broad public, site visits, and working groups spanning employees, management teams and unions'. [Reference document 2017, 2018: <a href="http://kering.com">kering.com</a> &amp; Reference Document 2018, 24/04/2019: <a href="http://keringcorporate.dam.kering.com">keringcorporate.dam.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. [Code of Ethics, 2019: <a href="http://keringcorporate.dam.kering.com">keringcorporate.dam.kering.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 threshold were found, and so the score of 27.76 out of 80 points scored in themes A-D & F has been applied to produce a score of 6.94 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	3 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 30 cases, leading to a disclosure score of 3 out of 4 points.
F.2	Recognised Reporting Initiatives	2 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>• Met: Company reports on UNGPRF: The Company provides an index with the 'correspondence between Kering's human rights approach and the United Nations Guiding Principles Reporting Framework'. [Reference Document 2018, 24/04/2019: <a href="http://keringcorporate.dam.kering.com">keringcorporate.dam.kering.com</a>]</li> </ul>
F.3	Key, High Quality Disclosures	0 out of 4	Kering met 0 of the 8 thresholds listed below and therefore gets 0 out of 4 points for the high quality disclosure indicator. Specificity and use of concrete examples

Indicator Code	Indicator name	Score	Explanation
			<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) Discussing challenges openly</li> <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 Demonstrating a forward focus</li> <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 2019 Key Findings report and technical annex for more details of the research process.

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

No representation or warranty is given that the material in the Benchmark is accurate, complete or up-to-date. The material in the Benchmark is based on information that we consider correct and any statements, opinions, conclusions or recommendations contained therein are honestly and reasonably held or made at the time of publication. Any opinions expressed are our current opinions as of the date of the publication of the Benchmark only and may change without notice. Any views expressed in the Benchmark only represent the views of CHRB Ltd, unless otherwise expressly noted.

While the material contained in the Benchmark has been prepared in good faith, neither CHRB Ltd nor any of its agents, representatives, advisers, affiliates, directors, officers or employees accept any responsibility for or make any representation or warranty (either express or implied) as to the truth, accuracy, reliability or completeness of the information contained in this Benchmark or any other information made available in connection with the Benchmark. Neither CHRB Ltd nor any of its agents, representatives, advisers, affiliates, directors, officers and employees undertake any obligation to provide the users of the Benchmark with additional information or to update the information contained therein or to correct any inaccuracies which may become apparent (save as to the extent set out in CHRB Ltd's appeals procedure). To the maximum extent permitted by law any responsibility or liability for the Benchmark or any related material is expressly disclaimed provided that nothing in this disclaimer shall exclude any liability for, or any remedy in respect of, fraud or fraudulent misrepresentation. Any disputes, claims or proceedings this in connection with or arising in relation to this Benchmark will be governed by and construed in accordance with English law and submitted to the exclusive jurisdiction of the courts of England and Wales.

As CHRB Ltd, we want to emphasise that the results will always be a proxy for good human rights management, and not an absolute measure of performance. This is because there are no fundamental units of measurement for human rights. Human rights assessments are therefore necessarily more subjective than objective. The Benchmark also captures only a snap shot in time. We therefore want to encourage companies, investors, civil society and governments to look at the broad performance bands that companies are ranked within rather than their precise score because, as with all measurements, there is a reasonably wide margin of error possible in interpretation. We also want to encourage a greater analytical focus on how scores improve over time rather than upon how a company compares to other companies in the same industry today. The spirit of the exercise is to promote continual improvement via an open assessment process and a common understanding of the importance of the UN Guiding Principles on Business and Human Rights.