

**Company Name** Kerry Group  
**Industry** Agricultural Products (Supply Chain only)  
**Overall Score (\*)** 18.4 out of 100

Theme Score	Out of	For Theme
2.6	10	A. Governance and Policies
3.8	25	B. Embedding Respect and Human Rights Due Diligence
4.2	15	C. Remedies and Grievance Mechanisms
2.5	20	D. Performance: Company Human Rights Practices
3.7	20	E. Performance: Responses to Serious Allegations
1.7	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	2	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Met: General HRs commitment: In its Human Rights Policy, the Company states that it 'respects internationally recognised Human Rights as established in the Universal Declaration on Human Rights and the International Labour Organisation's Core Conventions.' [Human Rights Policy, 03/2017: <a href="http://kerrygroup.com">kerrygroup.com</a>]</li> <li>Met: UDHR: See above</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Met: UNGPs: The Company, in line with the UN Guiding Principles on Business and Human Rights, 'recognises the corporate responsibility to respect these principles and commit to 'know and show' this through on-going human rights due diligence.' [Human Rights Policy, 03/2017: <a href="http://kerrygroup.com">kerrygroup.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: ILO Core: The Company commits to respecting the International Labour Organisation's Core Conventions, as stated in the Code of Conduct. The Human rights policy states that 'Kerry respects internationally recognised Human Rights as established in the Universal Declaration on Human Rights and the International Labour Organisation's Core Conventions'. [Group Code of Conduct, 10/04/2018: <a href="http://kerrygroup.com">kerrygroup.com</a>]</li> <li>Not met: Explicitly list All four ILO for AG suppliers: The Company states that its suppliers 'shall not permit child labour to be used,' 'shall not permit the use of forced or involuntary labour of any type,' 'shall not discriminate' in relevant practices, and 'shall respect the rights of employees to join or refrain from joining</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>worker organisations and will allow workplace access for such organisations to facilitate their representative functions.' However, there is no clear statement for the right to collective bargain. [Supplier Code of Conduct, 16/03/2017: <a href="http://kerrygroup.com">kerrygroup.com</a>]</p> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Explicit commitment to All four ILO Core: The Company states it does 'not use child or forced labour in any of [its] operations or facilities,' referencing the ILO core relating to child labour and forced labour. It also mentions Freedom of Association and Collective Bargaining, stating they believe 'in the rights of workers to associate freely and bargain collectively.' They also have a non-discrimination policy. [Group Code of Conduct, 10/04/2018: <a href="http://kerrygroup.com">kerrygroup.com</a>]</li> <li>• Met: Respect H&amp;S of workers: The Company's 'executive management is committed to a healthy and safe workplace.' [Group Code of Conduct, 10/04/2018: <a href="http://kerrygroup.com">kerrygroup.com</a>]</li> <li>• Met: H&amp;S applies to AG suppliers: The Company's suppliers 'shall ensure all employees work within safe and humane conditions.' [Supplier Code of Conduct, 16/03/2017: <a href="http://kerrygroup.com">kerrygroup.com</a>]</li> </ul>
A.1.3.AG.a	Commitment to respect human rights particularly relevant to the industry - land and natural resources (AG)	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: Respect land ownership and natural resources: The Company states in its No Deforestation Commitment that they 'Respect the right of all affected communities to give or withhold their free, prior and informed consent for plantation developments on land they own legally, communally or by custom.' [No Deforestation Commitment, 09/07/2018: <a href="http://kerrygroup.com">kerrygroup.com</a>]</li> <li>• Not met: Respecting the right to water</li> <li>• Met: Expecting suppliers to respect these rights: The Company states Suppliers 'will adhere to the principle of Free, Prior and Informed Consent.' However, no reference to the right to water could be found. [Supplier Code of Conduct, 16/03/2017: <a href="http://kerrygroup.com">kerrygroup.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: FPIC for all: As stated above, the Company makes a clear commitment to obtain the free prior and informed consent from relevant parties involved in land and natural resource transaction.</li> <li>• Not met: Respecting the right to water: The Company has identified sites where water risk is a priority, and is 'working with these locations to find opportunities to improve water stewardship.' However, no commitment to respect the right of water could be explicitly found. [Water: <a href="http://kerrygroup.com">kerrygroup.com</a>]</li> <li>• Not met: Expecting suppliers to respect these rights</li> </ul>
A.1.3.AG.b	Commitment to respect human rights particularly relevant to the industry – people's rights (AG)	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</li> <li>• Not met: Children's rights: The Company states the 'do not use child or forced labour in any of our operations or facilities.' The Company fully respects laws establishing a minimum age for employment, and supports the abolition of child labour. However, no evidence found in relation to commitment to children's rights. [Group Code of Conduct, 10/04/2018: <a href="http://kerrygroup.com">kerrygroup.com</a>]</li> <li>• Not met: Migrant worker's rights</li> <li>• Not met: Expects suppliers to respect these rights: 'Suppliers shall not permit child labour to be used in any operation connected' with the Company. No child under the age of 15 or below the age of finishing compulsory schooling may work in connection to operations of the Company. However, no evidence found in relation to Children's rights. [Supplier Code of Conduct, 16/03/2017: <a href="http://kerrygroup.com">kerrygroup.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: CEDAW/Women's Empowerment Principles</li> <li>• Not met: Child Rights Convention/Business Principles</li> <li>• Not met: Convention on migrant workers</li> <li>• Not met: Expecting suppliers to respect these rights</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: Commits to stakeholder engagement: The Company states in the annual report that 'We are committed to ongoing and constructive engagement with our key internal and external stakeholders and through a process of two-way engagement, we incorporate their views into our business activities' [...] 'Among our key stakeholders are employees, shareholders, communities, customers, consumers, government and suppliers including farmers.' [Annual Report 2018, 2018: <a href="http://kerrygroup.com">kerrygroup.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			Score 2 <ul style="list-style-type: none"> <li>Not met: Commits to engage stakeholders in design: The Company discloses that 'we are committed to the highest standards of business and ethical behaviour, to fulfilling our responsibilities to the communities which we serve and to the creation of long term value for all stakeholders on a socially and environmentally sustainable basis. Kerry works with local and international partners (e.g. World Food Programme and Concern Worldwide) to support local community development and improve health and nutrition in some of the world's poorest communities'. However, no evidence found in relation to commitment to engage with affected stakeholders in the development or monitoring of the human rights approach. [Annual Report 2018, 2018: <a href="http://kerrygroup.com">kerrygroup.com</a>]</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 AG 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)</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Not met: Expects AG suppliers to reflect company HRD commitments</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	0.5	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 Company's code of conduct contains the letter from the CEO and commitments to human rights. [Group Code of Conduct, 10/04/2018: <a href="http://kerrygroup.com">kerrygroup.com</a>]</li> <li>Not met: Board level responsibility for HRs</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Not met: Speeches/letters by Board members or CEO</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</li> <li>Not met: Examples or trends re HR discussion</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Not met: Both examples and process</li> </ul>
A.2.3	Incentives and performance management	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Not met: Incentives for at least one board member</li> <li>Not met: At least one key AG HR risk, beyond employee H&amp;S</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Not met: Performance criteria made public</li> </ul>

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

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.1	Responsibility and resources for day-to-day human rights functions	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Met: Commits to ILO core conventions</li> <li>Met: Senior responsibility for HR: The 'Towards 2020' programme outlines many sustainable practices, including human rights in the workplace. This programme is governed by the Sustainability Council, which is chaired by a Senior member of the executive committee, and includes leadership from other parts of the Company, who implement the programme within their respective areas. [Annual Report 2018, 2018: <a href="http://kerrygroup.com">kerrygroup.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Not met: Day-to-day responsibility</li> <li>Not met: Day-to-day responsibility for AG in supply chain</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.2	Incentives and performance management	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Senior manager incentives for human rights</li> <li>• Not met: At least one key AG HR risk, beyond employee H&amp;S</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Performance criteria made public</li> </ul>
B.1.3	Integration with enterprise risk management	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: HR risks is integrated as part of enterprise risk system</li> </ul> Score 2 <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	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Met: Commits to ILO core conventions: See indicator A.1.2</li> <li>• Met: Communicates its policy to all workers in own operations: The Company says its 'policies are communicated and available to all employees.' Although no explanation regarding languages found, the Company also indicates that 'mandatory training for colleagues on the Group's code of Conduct is delivered through our Learning Management System. This training covers the key elements of the code of conduct, which includes commitment to upholding human rights. [Slavery Statement, April, 2019: <a href="http://kerrygroup.com">kerrygroup.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Met: Commits to all 4 ILO core conventions: See indicator A.1.2</li> <li>• Not met: Communication of policy commitments to stakeholder</li> <li>• Not met: How policy commitments are made accessible to audience</li> </ul>
B.1.4.b	Communication /dissemination of policy commitment(s) to business relationships	0.5	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 all 4 ILO core conventions for suppliers: See indicator A.1.2</li> <li>• Not met: Communicating policy down the whole AG supply chain: The Supplier Code of Conduct serves as a binding document to which the Company's suppliers must adhere, and part of the Code includes human rights. The Code has also been translated into several languages, ensuring that all suppliers will be able to understand and apply it to their operations. However, no information about the Company communicating this policy further down the supply chain could be found. [Supplier Code of Conduct, 16/03/2017: <a href="http://kerrygroup.com">kerrygroup.com</a>]</li> </ul> <ul style="list-style-type: none"> <li>• Not met: Requiring AG suppliers to communicate policy down the chain: The Supplier Code of Conduct states that it is 'expected that suppliers apply similar levels of compliance to their own suppliers,' however this does not imply that they are obligated to communicate the Company's human rights policy down the supply chain and that code is communicated. [Supplier Code of Conduct, 16/03/2017: <a href="http://kerrygroup.com">kerrygroup.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Met: How HR commitments made binding/contractual: As stated above, the Supplier Code of Conduct is a binding agreement.</li> <li>• Not met: Including on AG suppliers</li> </ul>
B.1.5	Training on Human Rights	0.5	The individual elements of the assessment are met or not as follows: Score 1 <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 indicates that 'mandatory training for colleagues on the Group's Code of Conduct is delivered through our Learning Management System. This training covers the key elements of our Group Code of Conduct, which includes our commitment to upholding human rights. In 2017, we also launched further training for all colleagues on the Group's broader sustainability programme 'Towards 2020'. [Slavery Statement, April, 2019: <a href="http://kerrygroup.com">kerrygroup.com</a>]</li> </ul> <ul style="list-style-type: none"> <li>• Not met: Trains relevant AG managers including procurement</li> </ul> Score 2 <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>
B.1.6	Monitoring and corrective actions	0.5	The individual elements of the assessment are met or not as follows: Score 1 <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 'we have processes in place to ensure compliance and to support implementation and monitoring of the Group's Human Rights policy. All Group businesses are members of SEDEX and complete the Self-Assessment Questionnaire, which includes questions regarding young employees, forced labour and human rights. In developing regions, where there is potential for an increased</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>risk of infringement, all of our sites are covered by SMETA, or equivalent, audits'. [Sustainability Report: <a href="http://kerrygroup.com">kerrygroup.com</a>]</p> <ul style="list-style-type: none"> <li>• Met: Monitoring AG suppliers: The Company states that 'through the use of independent risk evaluations tools and internal assessment, we have identified higher risk suppliers, based on geographic location and/or the risk associated with the product supplied to Kerry. For each of these suppliers, we seek further engagement through SEDEX to help us assess their performance. In 2017, 40% of these suppliers were registered on SEDEX, in line with our target for 100% registration of all 'higher risk' suppliers by 2020'. [Sustainability Report: <a href="http://kerrygroup.com">kerrygroup.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>• Not met: Describes corrective action process</li> <li>• Not met: Example of corrective action</li> <li>• Not met: Discloses % of AG supply chain monitored</li> </ul>
B.1.7	Engaging business relationships	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: HR affects AG selection of suppliers</li> <li>• Met: HR affects on-going AG supplier relationships: The company indicates that 'where suppliers are found to have contravened the requirements set out in this [supplier] code, Kerry Group reserves the right to terminate any associated agreement or business relationship'. [Slavery Statement, April, 2019: <a href="http://kerrygroup.com">kerrygroup.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: Working with AG suppliers to improve performance</li> </ul>
B.1.8	Approach to engagement with potentially affected stakeholders	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Stakeholder process or systems</li> <li>• Not met: Frequency and triggers for engagement</li> <li>• Not met: Workers in AG SC engaged</li> <li>• Not met: Communities in the AG SC engaged</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Analysis of stakeholder views and company's actions on them</li> </ul>

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.1	Identifying: Processes and triggers for identifying human rights risks and impacts	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Identifying risks in own operations</li> <li>• Not met: Identifying risks in AG suppliers: The Company adopts 'a targeted approach to monitoring supplier compliance with [the Supplier Code of Conduct]. Through the use of independent risk evaluation tools and internal assessment, we have identified higher risk suppliers, based on geographic location and/or the risk associated with the product supplied to' the Company. However, these process seems to be used to monitor compliance and does not describe how it identifies which are the specific risks faced in its supply chain. [Sustainability Report: <a href="http://kerrygroup.com">kerrygroup.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Ongoing global risk identification</li> <li>• Not met: In consultation with stakeholders</li> <li>• Not met: In consultation with HR experts</li> <li>• Not met: Triggered by new circumstances</li> <li>• Not met: Explains use of HRIAs or ESIA (inc HR)</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)</li> <li>• Not met: Public disclosure of salient risks</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> </ul>
B.2.3	Integrating and Acting: Integrating assessment	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Action Plans to mitigate risks</li> <li>• Not met: Including in AG supply chain</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
	findings internally and taking appropriate action		<ul style="list-style-type: none"> <li>Met: Example of Actions decided: In the context of vanilla supply chain in Madagascar, where there is a labour intense sector and very low income, the Company is working to improve lives of farmers and families. Along with its supplier in Madagascar, they 'have set up the 'Tsara Kalitao' Project, which translates as 'Good Quality' in Malagasy. At its core it focuses on training farmers to produce better quality vanilla beans and increase their income. However, the broader programme is designed to support the sustainable development of the region. It does this through three elements; Farmer Income, Empowering Women and Education.' [Tsara Kalitao: <a href="http://kerrygroup.com">kerrygroup.com</a>]</li> </ul> Score 2 <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	The individual elements of the assessment are met or not as follows: Score 1 <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> Score 2 <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	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Not met: Comms plan re identifying risks</li> <li>Not met: Comms plan re assessing risks</li> <li>Not met: Comms plan re action plans for risks</li> <li>Not met: Comms plan re reviewing action plans</li> <li>Not met: Including AG suppliers</li> </ul> Score 2 <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	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Met: Channel accessible to all workers: The Company uses the platform EthicsPoint (both online and telephone) as an alternative to speaking with the 'manager/supervisor, Human Resources or Internal Audit,' which are the other options to report concerns. In the countries where 'privacy laws limit use of this hotline to concerns related to finance, auditing, accounting, banking and anti-bribery matters,' it is recommended to contact one of the aforementioned people. [EthicsPoint: <a href="http://secure.ethicspoint.com">secure.ethicspoint.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Not met: Number grievances filed, addressed or resolved</li> <li>Met: Channel is available in all appropriate languages: The Hotline is available 'in more than 100 languages, 24 hours a day, 7 days a week.' [EthicsPoint: <a href="http://secure.ethicspoint.com">secure.ethicspoint.com</a>]</li> <li>Met: Opens own system to AG supplier workers: The 'independent ethics hotline is also available to our suppliers and their workers.' [Slavery Statement, April, 2019: <a href="http://kerrygroup.com">kerrygroup.com</a>]</li> </ul>
C.2	Grievance channel(s)/mechanism(s) to receive complaints or concerns from external individuals and communities	2	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Met: Grievance mechanism for community: The EthicsPoint website is available to any person, in or outside of the Company. [EthicsPoint: <a href="http://secure.ethicspoint.com">secure.ethicspoint.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Met: Describes accessibility and local languages: As stated in C.1, the Hotline is available in over 100 languages, 24 hours a day and 7 days a week, and is an online service available from anywhere. [EthicsPoint: <a href="http://secure.ethicspoint.com">secure.ethicspoint.com</a>]</li> <li>Met: AG supplier communities use global system: The mechanism is available to anyone and is an online service. [Slavery Statement, April, 2019: <a href="http://kerrygroup.com">kerrygroup.com</a> &amp; EthicsPoint: <a href="http://secure.ethicspoint.com">secure.ethicspoint.com</a>]</li> </ul>
C.3	Users are involved in the design and performance of the	0	The individual elements of the assessment are met or not as follows: Score 1 <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> Score 2 <ul style="list-style-type: none"> <li>Not met: Engages with users on system performance</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
	channel(s)/mechanism(s)		<ul style="list-style-type: none"> <li>• Not met: Provides user engagement example on performance</li> <li>• Not met: AG 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</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	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: Public statement prohibiting retaliation: The Company states 'Retaliation against any individual for reporting a concern or cooperating in an investigation will not be tolerated.' [Group Code of Conduct, 10/04/2018: <a href="http://kerrygroup.com">kerrygroup.com</a>]</li> <li>• Met: Practical measures to prevent retaliation: In order to prevent retaliation, the Company has set up a third-party hotline with which the complainant can remain anonymous. [EthicsPoint: <a href="http://secure.ethicspoint.com">secure.ethicspoint.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Has not retaliated in practice</li> <li>• Met: Expects AG suppliers to prohibit retaliation: The Company requires that suppliers have a system in place to address possible misconduct, and states that 'Where issues are identified through internal reporting, whistle-blowers will be protected from any negative repercussions.' [Supplier Code of Conduct, 16/03/2017: <a href="http://kerrygroup.com">kerrygroup.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</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 incorporating lessons learned	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Describes how remedy has been provided</li> <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.1.1.b	Living wage (in the supply chain)	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Living wage in supplier code or contracts</li> <li>• Met: Improving living wage practices of suppliers: The Company started a programme in 2014 in Madagascar, to improve the lives of the vanilla bean farmers. 'Through training and the payment of a premium for their produce, we encourage farmers to improve their agriculture practices and in turn their income.' [Tsara Kalitao: <a href="http://kerrygroup.com">kerrygroup.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: Provides analysis of trends demonstrating progress</li> </ul>
D.1.2	Aligning purchasing decisions with human rights	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Avoids business model pressure on HRs (purchasing practices)</li> <li>• Not met: Positive incentives to respect human rights (purchasing practices)</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> </ul>
D.1.3	Mapping and disclosing 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: Identifies suppliers back to manufacturing sites (factories or fields)</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Discloses significant parts of SP and why</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.1.4.b	Prohibition on child labour: Age verification and corrective actions (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Child Labour rules in codes or contracts: It is stated that no child labour may be used in operations connected to the Company, however it does not mention verifying the age of job applicants and workers or remediation programmes. [Supplier Code of Conduct, 16/03/2017: <a href="http://kerrygroup.com">kerrygroup.com</a>]</li> <li>• Not met: How working with suppliers on child labour: The Company also states that for people under the age of 18, 'suppliers will ensure that their work is not likely to be harmful to their health and/or development,' but does not describe steps of how working conditions could be improved. [Supplier Code of Conduct, 16/03/2017: <a href="http://kerrygroup.com">kerrygroup.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: Analysis of trends in progress made</li> </ul>
D.1.5.b	Prohibition on forced labour: Debt bondage and other unacceptable financial costs (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Debt and fees rules in codes or contracts</li> <li>• Not met: How working with suppliers on debt &amp; fees</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> <li>• Not met: Analysis of trends in progress made</li> </ul>
D.1.5.d	Prohibition on forced labour: Restrictions on workers (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Free movement rules in codes or contracts</li> <li>• Not met: How working with suppliers on free movement</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> <li>• Not met: Provides analysis of trends demonstrating progress</li> </ul>
D.1.6.b	Freedom of association and collective bargaining (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: FoA &amp; CB rules in codes or contracts: The Company states that 'Suppliers shall respect the rights of employees to join or refrain from joining worker organisations,' but no specific reference found to collective bargaining, nor does it mention prohibition of intimidation, harassment, etc. [Supplier Code of Conduct, 16/03/2017: <a href="http://kerrygroup.com">kerrygroup.com</a>]</li> <li>• Not met: How working with suppliers on FoA and CB</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> <li>• Not met: Provides analysis of trends demonstrating progress</li> </ul>
D.1.7.b	Health and safety: Fatalities, lost days, injury rates (in the supply chain)	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Met: Sets out clear Health and Safety requirements: Suppliers to the Company 'shall ensure all employees work within safe and humane conditions, including providing adequate training and effective protective equipment to safely carry out their duties. Suppliers will also provide access to clean toilet facilities, potable water and sanitary facilities for food storage.' [Supplier Code of Conduct, 16/03/2017: <a href="http://kerrygroup.com">kerrygroup.com</a>]</li> <li>• Not met: Injury Rate disclosures</li> <li>• Not met: Lost days or near miss disclosures</li> <li>• Not met: Fatalities disclosure</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: How working with suppliers on H&amp;S</li> <li>• Not met: Provides analysis of trends demonstrating progress</li> </ul>
D.1.8.b	Land rights: Land acquisition (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Rules on land &amp; owners in codes or contracts: The Supplier requirements manual states that 'suppliers shall respect the rights to land tenure of local communities and indigenous peoples impacted by its operations, including its raw material sourcing, and will adhere to the principle of Free, Prior and Informed Consent'. However, no evidence found of requiring to have a process to identify legitimate tenure right holders, particularly vulnerable ones. [Supplier Requirements Manual 2017, 26/04/2017: <a href="http://kerrygroup.com">kerrygroup.com</a>]</li> <li>• Not met: How working with suppliers on land issues</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> <li>• Not met: Provides analysis of trends demonstrating progress</li> </ul>



Indicator Code	Indicator name	Score (out of 2)	Explanation
D.1.9.b	Water and sanitation (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Rules on water stewardship in codes or contracts</li> <li>• Not met: How working with suppliers on water stewardship issues</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> <li>• Not met: Provides analysis of trends demonstrating progress</li> </ul>
D.1.10.b	Women's rights (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>• Not met: Women's rights in codes or contracts</li> <li>• Met: How working with suppliers on women's rights: The Company 'has developed an educational programme for women to help them diversify their income by building coops and breeding chickens for eggs and meat, which they can sell or trade for rice during low income periods. The next step is to offer training on income management to help women meet their family's needs all year round and reducing the need for farmers to sell their beans during months when they will receive a lower return.' [Tsara Kalitao: <a href="http://kerrygroup.com">kerrygroup.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: Provides analysis of trends demonstrating progress</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 14.73 out of 80 points scored in themes A-D & F has been applied to produce a score of 3.68 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	1.71 out of 4	Out of a total of 42 indicators assessed under sections A-D of the benchmark, Kerry Group made data public that met one or more elements of the methodology in 18 cases, leading to a disclosure score of 1.71 out of 4 points.
F.2	Recognised Reporting Initiatives	0 out of 2	The individual elements of the assessment are met or not as follows: Score 2 <ul style="list-style-type: none"> <li>• Not met: Company reports on GRI</li> <li>• Not met: Company reports on SASB</li> <li>• Not met: Company reports on UNGPRF</li> </ul>
F.3	Key, High Quality Disclosures	0 out of 4	Kerry Group 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 <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> Discussing challenges openly <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> Demonstrating a forward focus <ul style="list-style-type: none"> <li>• Not met: Score 2 for A.2.3 : Incentives and performance management</li> <li>• Not met: Score 2 for B.1.2 : Incentives and performance management</li> </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

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