

Company Name Kirin Holdings Company
Industry Agricultural Products (Supply Chain only)
Overall Score (*) 23.0 out of 100

Theme Score	Out of	For Theme
4.5	10	A. Governance and Policies
5.5	25	B. Embedding Respect and Human Rights Due Diligence
0.0	15	C. Remedies and Grievance Mechanisms
0.0	20	D. Performance: Company Human Rights Practices
10.0	20	E. Performance: Responses to Serious Allegations
3.1	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	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Met: General HRs commitment: The Company states in its human rights policy that "Respect for human rights is a foundation for all our business activities. We recognize that companies such as ours must continuously deepen their understanding of the potential human rights associated with their own business and global value chain and take appropriate action to ensure respect for rights". [Human Rights Policy, 09/02/2018: kirinholdings.co.jp] Not met: UDHR [Human Rights Policy, 09/02/2018: kirinholdings.co.jp] Met: International Bill of Rights: The Company is committed to respecting human rights as set out in the International Bill of Human Rights and the International Labour Organization's Declaration on Fundamental Principles and Rights at Work. [Human Rights Policy, 09/02/2018: kirinholdings.co.jp] <p>Score 2</p> <ul style="list-style-type: none"> Met: UNGPs: The Company also supports and is working to implement the United Nations Guiding Principles on Business and Human Rights. [Human Rights Policy, 09/02/2018: kirinholdings.co.jp] Not met: OECD
A.1.2	Commitment to respect the human rights of workers	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Met: ILO Core: The Company states that it is committed to respecting human rights as set out in the International Labour Organization's Declaration on Fundamental Principles and Rights at Work. [Human Rights Policy, 09/02/2018: kirinholdings.co.jp]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Met: Explicitly list All four ILO for AG suppliers: The Company states in its Supplier CSR Guidelines that its considerations of human rights include: 'prohibition of discrimination, prohibition to inhumane treatment, occupational health and safety, guarantee of minimum wage, responsible practices, respect for freedom to organize and collective bargaining rights, prohibition of forced labour, prohibition of child labour and responsibility towards local communities'. [Policy on CSR Procurement: kirinholdings.co.jp] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Explicit commitment to All four ILO Core: The Company states in its human rights policy that it prohibits any form of discrimination, that it commits to 'respecting freedom of association and the right to collective bargaining', and that it opposes any form of slavery or forced labor, including human trafficking, and child labor. [Human Rights Policy, 09/02/2018: kirinholdings.co.jp] • Met: Respect H&S of workers: The Company states that it gives top priority to securing health and safety and strives to maintain a safe and health workplace environment. [Health and Well-being Policy: kirinholdings.co.jp] • Met: H&S applies to AG suppliers: The Company states in its Supplier CSR Guidelines that its considerations of human rights include occupational health and safety. [Policy on CSR Procurement: kirinholdings.co.jp]
A.1.3.AG.a	Commitment to respect human rights particularly relevant to the industry - land and natural resources (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"> • Not met: Respect land ownership and natural resources • Not met: Respecting the right to water: The Company states that it committed to making sure its business operations in Myanmar do not create any negative impacts on surrounding communities, with a particular focus on the environment, as well as right of access to land and water given the nature of local business. Also, the Company describes its programs to conserve water on farms by planting trees and preserve the watersheds plus education programs for valuing water. However, Company's commitment is focused in one operation (Myanmar) and no evidence found of a company-wide commitment to respect the human right to water. [Human rights impact assessment in Myanmar, 08/2018: kirinholdings.co.jp & Environmental Report, 2018: kirinholdings.co.jp] • Not met: Expecting suppliers to respect these rights [Policy on CSR Procurement: kirinholdings.co.jp] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Voluntary Guidelines on Tenure Rights • Not met: IFC Performance Standards • Not met: FPIC for all • Not met: Zero tolerance for land grabs • Not met: Respecting the right to water: see above [Human rights impact assessment in Myanmar, 08/2018: kirinholdings.co.jp] • Not met: Expecting suppliers to respect these rights
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"> • Not met: Women's rights • Not met: Children's rights • Not met: Migrant worker's rights • Not met: Expects suppliers to respect these rights <p>Score 2</p> <ul style="list-style-type: none"> • Not met: CEDAW/Women's Empowerment Principles • Not met: Child Rights Convention/Business Principles • Not met: Convention on migrant workers • Not met: Expecting suppliers to respect these rights
A.1.4	Commitment to engage with stakeholders	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Commits to stakeholder engagement: The Company discloses that when created its Human Rights Policy had a dialogue with stakeholders to have their view to draft its policy. Also, the Company states that 'As we move forward on our journey, we will continue to engage with our stakeholders concerning the human rights issues associated with our business and seek to update our practices to respect human rights'. [Human Rights Policy, 09/02/2018: kirinholdings.co.jp] • Met: Regular stakeholder engagement: The Company states that it implements the employee engagement survey. The Company also states that it actively engages in constructive dialogue with its stakeholder. In 2017, the Company also selected 'community engagement' as one of the key social issues among the various social issues that affects the Company. Furthermore, the company report that "listening earnestly to the opinions of our suppliers and other stakeholders, we will make efforts to ensure an understanding of the "Kirin Group Sustainable Procurement

Indicator Code	Indicator name	Score (out of 2)	Explanation
			Policy” and work together with our stakeholders toward realizing this policy.” [Kirin Report 2018, 09/08/2018: unglobalcompact.org & CSV Commitment: kirinholdings.co.jp] Score 2 <ul style="list-style-type: none"> • Not met: Commits to engage stakeholders in design [Policy on CSR Procurement: kirinholdings.co.jp] • Met: Regular stakeholder design engagement: The Company states that 'engage in dialogue with a variety of stakeholders and Kirin Group executives when their policies. Furthermore, the company report that "listening earnestly to the opinions of our suppliers and other stakeholders, we will make efforts to ensure an understanding of the “Kirin Group Sustainable Procurement Policy” and work together with our stakeholders toward realizing this policy." [Policy on CSR Procurement: kirinholdings.co.jp]
A.1.5	Commitment to remedy	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Commits to remedy: The Company states in its Human Rights Policy that it will act upon the findings of this due diligence and endeavour to deliver appropriate and effective remedy where it identifies that it has caused or contributed to adverse human rights impacts. [Human Rights Policy, 09/02/2018: kirinholdings.co.jp] Score 2 <ul style="list-style-type: none"> • Not met: Not obstructing access to other remedies • Not met: Collaborating with other remedy initiatives: The Company discloses that conducted a biodiversity risk assessment and about 25% of black tea leaves imported to Japan from Sri Lanka are used in Kirin's operation. In response to this the Company started to provide assistance for willing Sri Lanka tea farmers to obtain Rainforest Alliance certification. However, no evidence found of collaborating in initiatives that provide access to remedy adverse impacts the company that it caused or contributed to. [Environmental Report, 2018: kirinholdings.co.jp] • Not met: Work with AG suppliers to remedy impacts
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"> • Not met: Zero tolerance attacks on HRs Defenders (HRDs) Score 2 <ul style="list-style-type: none"> • Not met: Expects AG suppliers to reflect company HRD commitments

A.2 Policy Commitments (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.2.1	Commitment from the top	2	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: CEO or Board approves policy: The Company's Human Rights Policy is signed by the President & CEO. [Human Rights Policy, 09/02/2018: kirinholdings.co.jp] • Met: Board level responsibility for HRs: The Company states that Mr. Toshiya Miyoshi, Director of the board, Senior Executive Officer, has worked in the areas of human resources management, corporate planning, diversification of business and the senior executive officer for human resources strategy is responsible for management of the human rights policy. [Kirin Report 2018, 09/08/2018: unglobalcompact.org & Corporate Profile, Management, 28/3/2019: kirinholdings.co.jp] Score 2 <ul style="list-style-type: none"> • Met: Speeches/letters by Board members or CEO: The Company's Human Rights Policy is signed off and prefaced by the President & CEO. The Letter from CEO is the cover of the Policy. In it he states that the Company will promote respect human rights based on the Guiding Principles, which reflect the Global standards. "We have been working to deepen each department's understanding of a wide range of human rights issues, as such understanding is necessary for global companies. We have also undertaken interdepartmental projects and received advice from outside experts. These efforts formed the foundation of which we created the Kirin Human Rights policy". [Human Rights Policy, 09/02/2018: kirinholdings.co.jp]
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"> • Not met: Board/Committee review of salient HRs • Not met: Examples or trends re HR discussion

Indicator Code	Indicator name	Score (out of 2)	Explanation
			Score 2 • Not met: Both examples and process
A.2.3	Incentives and performance management	0	The individual elements of the assessment are met or not as follows: Score 1 • Not met: Incentives for at least one board member • Not met: At least one key AG HR risk, beyond employee H&S Score 2 • Not met: Performance criteria made public

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

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.1	Responsibility and resources for day-to-day human rights functions	1	The individual elements of the assessment are met or not as follows: Score 1 • Met: Commits to ILO core conventions: See indicator A.1.2 [Human Rights Policy, 09/02/2018: kirinholdings.co.jp] • Met: Senior responsibility for HR: The Company states that the senior executive officer for human resources strategy is responsible for management of the human rights policy. [Human Rights Policy, 09/02/2018: kirinholdings.co.jp] Score 2 • Not met: Day-to-day responsibility • Not met: Day-to-day responsibility for AG in supply chain
B.1.2	Incentives and performance management	0	The individual elements of the assessment are met or not as follows: Score 1 • Not met: Senior manager incentives for human rights • Not met: At least one key AG HR risk, beyond employee H&S Score 2 • Not met: Performance criteria made public
B.1.3	Integration with enterprise risk management	0	The individual elements of the assessment are met or not as follows: Score 1 • Not met: HR risks is integrated as part of enterprise risk system: The Company states that its major identified risks include risk related to human resources. However, it has not explicitly mentioned human right risks. [Kirin Report 2018, 09/08/2018: unglobalcompact.org] Score 2 • Not met: Audit Ctte or independent risk assessment
B.1.4.a	Communication /dissemination of policy commitment(s) within Company's own operations	0	The individual elements of the assessment are met or not as follows: Score 1 • Met: Commits to ILO core conventions: See indicator A.1.2 [Human Rights Policy, 09/02/2018: kirinholdings.co.jp] • Not met: Communicates its policy to all workers in own operations: The Company discloses that trains workers on human rights issue. However, does not describe how is its process to communicate its human rights policy to all workers. [ESG Data: kirinholdings.co.jp] Score 2 • Met: Commits to all 4 ILO core conventions: See indicator A.1.2 [Human Rights Policy, 09/02/2018: kirinholdings.co.jp] • Not met: Communication of policy commitments to stakeholder • Not met: How policy commitments are made accessible to audience [Human Rights Policy, 09/02/2018: kirinholdings.co.jp]
B.1.4.b	Communication /dissemination of policy commitment(s) to business relationships	0	The individual elements of the assessment are met or not as follows: Score 1 • Met: Commits to all 4 ILO core conventions for suppliers: See indicator A.1.2 • Not met: Communicating policy down the whole AG supply chain: Evidence found for Japan integrated business segment. Not clear the steps taken to communicate it company wide. [Policy on CSR Procurement: kirinholdings.co.jp & Activities to Promote CSR Procurement: kirinholdings.co.jp] • Not met: Requiring AG suppliers to communicate policy down the chain Score 2 • Not met: How HR commitments made binding/contractual • Not met: Including on AG suppliers
B.1.5	Training on Human Rights	1	The individual elements of the assessment are met or not as follows: Score 1 • Met: Scores at least 1 on A.1.2 [Human Rights Policy, 09/02/2018: kirinholdings.co.jp]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Met: Trains all workers on HR policy commitments: The Company reports that it provides Human Rights Awareness training to all employees. Furthermore, the company state "Kirin Group trains employees on human rights every year. We also provide executive training sessions on human rights to presidents and general managers of Group companies every year." [Embedding the Kirin Group Human Rights Policy in practice: kirinholdings.co.jp] • Not met: Trains relevant AG managers including procurement: The Company reports that they provided Human Rights Awareness training for Top-level Management in 2018 and executive training sessions on human rights to presidents and general managers. However, it is not clear whether procurement managers also attended the training. [Embedding the Kirin Group Human Rights Policy in practice: kirinholdings.co.jp & Policy on CSR Procurement: kirinholdings.co.jp] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Score of 2 on A.1.2 [Human Rights Policy, 09/02/2018: kirinholdings.co.jp] • Not met: Both requirements under score 1 met
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"> • Met: Scores at least 1 on A.1.2 [Human Rights Policy, 09/02/2018: kirinholdings.co.jp] • Met: Monitoring implementation of HR policy commitments: The company states "we appoint and train a staff member in charge of human rights promotion in each Group company and hold study groups and training sessions for persons responsible for harassment consultation to raise awareness of human rights in workplaces throughout the Group. To review the effectiveness of such measures, we conduct a survey on human rights awareness among Group company employees every year. We use the survey results to assess changes in awareness among employees and issues to be resolved in each Group company and plan our future activities accordingly." [Embedding the Kirin Group Human Rights Policy in practice: kirinholdings.co.jp & Implementing Human Rights Due Diligence: kirinholdings.co.jp] • Not met: Monitoring AG suppliers: The Company reports monitoring suppliers. However, it is not clear whether human rights are included, and whether coverage is beyond Japan Integrated business segment. [Activities to Promote CSR Procurement: kirinholdings.co.jp] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Score of 2 on A.1.2 [Human Rights Policy, 09/02/2018: kirinholdings.co.jp] • Not met: Describes corrective action process • Not met: Example of corrective action • Not met: Discloses % of AG supply chain monitored
B.1.7	Engaging business relationships	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: HR affects AG selection of suppliers • Not met: HR affects on-going AG supplier relationships: The Company discloses that require suppliers strictly adhere to Kirin's code of conduct. 'After initiating transactions with a supplier, we assess the status of the supplier's efforts related to CSR procurement once a year. In addition, our procurement staff conducts on-site inspections of the supplier. We then provide feedback from the inspection results...and, if necessary, undertake additional inspections or request that the suppliers enhance their CSR activities. However, there is no description how suppliers' actions affect in decisions to renew, expand or terminate business relationships. [Activities to Promote CSR Procurement: kirinholdings.co.jp] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirement under score 1 met • Not met: Working with AG suppliers to improve performance
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"> • Not met: Stakeholder process or systems • Not met: Frequency and triggers for engagement • Not met: Workers in AG SC engaged • Not met: Communities in the AG SC engaged <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Analysis of stakeholder views and company's actions on them

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.1	Identifying: Processes and triggers for identifying human rights risks and impacts	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Identifying risks in own operations: The Company states that it has a due diligence process 'In accordance with the Guiding Principles on Business and Human Rights, endorsed by the United Nations Human Rights Council, Kirin Group has begun carrying out human rights due diligence. This is a continuous process based on our commitment to ensure respect for human rights (Kirin Group Human Rights Policy) and includes steps from identifying human rights issues in the Kirin Group's value chain and planning and implementing corrective action to monitoring, disclosing information, and communicating with external stakeholders. [Implementing Human Rights Due Diligence: kirinholdings.co.jp] • Not met: Identifying risks in AG suppliers: The Company states that 'in consultation with an independent external consultant, experts and local stakeholders, we identified six salient risks for our business in Myanmar: occupational health and safety, labour rights, forced labour, child labour, supply chain and surrounding communities'. However, it is not clear if the risks identified is referent the company's operations or to suppliers. [Human Rights Policy, 09/02/2018: kirinholdings.co.jp & Implementing Human Rights Due Diligence: kirinholdings.co.jp] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Ongoing global risk identification: The Company Human Rights Due Diligence state that since the launch of the company's Human Rights policy in February 2018, the company has been strengthening their approach to identify, prevent and mitigate human rights impacts related to the company's activities. The company states that 'as Kirin Group grows our business globally, we want to ensure that we understand the potential for negative impacts on human rights and let this inform whether and how we enter new businesses or markets. We have included human rights due diligence as part of our broader due diligence process to assess the suitability of potential new investments, using a checklist developed in line with the Kirin Group Human Rights Policy". [Implementing Human Rights Due Diligence: kirinholdings.co.jp] • Met: In consultation with stakeholders: As indicated above the Company state that carried out the process in consultation with local stakeholders. [Implementing Human Rights Due Diligence: kirinholdings.co.jp] • Met: In consultation with HR experts: The Company states that taking guidance from international human rights and labour standards and in consultation with third party experts, it identified its salient human rights risks that are particularly significant for the alcoholic and non-alcoholic beverages industry. [Implementing Human Rights Due Diligence: kirinholdings.co.jp] • Not met: Triggered by new circumstances • Not met: Explains use of HRIAs or ESIA (inc HR): The Company describes its Human Rights Impacts Assessment (HRIA) in Myanmar, that happened on August 2018 and that with the HRIA identified six salient risks of its operation in Myanmar and could elaborate a design action plan to strength existent practices and put in places new ones to address the risks in line with international conventions. However, it is not clear when the company carries out the HRIA and how often they take place. [Human Rights Impact Assessment in Myanmar, 2018: kirinholdings.co.jp]
B.2.2	Assessing: Assessment of risks and impacts identified (salient risks and key industry risks)	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Salient risk assessment (and context): The Company states that for the human rights issues identified, it performed human rights risk assessments by country using the databases of international organizations and NGOs for countries it conducts business in and countries where its suppliers operate, and then determined the priority. [Implementing Human Rights Due Diligence: kirinholdings.co.jp] • Not met: Public disclosure of salient risks: The Company describes that in consultation with an independent external consultant experts and local stakeholders, identified six salient risks of its business in Myanmar, which are occupational health and safety, labour rights, forced labour, child labour, supply chain and surrounding communities. However, this indicator looks for salient risks in all operation, not only one specific place as the Company described. [Human Rights Impact Assessment in Myanmar, 2018: kirinholdings.co.jp] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.3	Integrating and Acting: Integrating assessment findings internally and taking appropriate action	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: Action Plans to mitigate risks: The Company states that it will identify, prevent and mitigate adverse human rights impacts with which it is involved in line with the United Nations Guiding Principles on Business and Human Rights. However, it has not described the system to prevent, mitigate or remediate. [Human Rights Policy, 09/02/2018: kirinholdings.co.jp] Not met: Including in AG supply chain Met: Example of Actions decided: The Company has set action plans to mitigate the risk such as to conduct a further assessment of the subcontractors and business partners on their employment practices in collaboration with independent external experts to identify risks of forced labour and areas for improvement. [Human rights impact assessment in Myanmar, 08/2018: kirinholdings.co.jp] Score 2 <ul style="list-style-type: none"> Not met: Both requirements under score 1 met
B.2.4	Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: System to check if Actions are effective Not met: Lessons learnt from checking effectiveness Score 2 <ul style="list-style-type: none"> Not met: Both requirement under score 1 met
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"> Not met: Comms plan re identifying risks [Human Rights Policy, 09/02/2018: kirinholdings.co.jp] Not met: Comms plan re assessing risks Not met: Comms plan re action plans for risks Not met: Comms plan re reviewing action plans Not met: Including AG suppliers Score 2 <ul style="list-style-type: none"> Not met: Responding to affected stakeholders concerns Not met: Ensuring affected stakeholders can access communications

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.1	Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: Channel accessible to all workers: The Company states that its existing inquiry channels may be used to raise concerns related to its business activities. However, no further information found on how these channels (access, operation, etc.) [Human Rights Policy, 09/02/2018: kirinholdings.co.jp] Score 2 <ul style="list-style-type: none"> Not met: Number grievances filed, addressed or resolved Not met: Channel is available in all appropriate languages Not met: Expect AG supplier to have equivalent grievance systems Not met: Opens own system to AG supplier workers
C.2	Grievance channel(s)/mechanism(s) to receive complaints or concerns from external individuals and communities	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: Grievance mechanism for community Score 2 <ul style="list-style-type: none"> Not met: Describes accessibility and local languages Not met: Expects AG supplier to have community grievance systems Not met: AG supplier communities use global system
C.3	Users are involved in the design and performance of the channel(s)/mechanism(s)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: Engages users to create or assess system Not met: Description of how they do this Score 2 <ul style="list-style-type: none"> Not met: Engages with users on system performance Not met: Provides user engagement example on performance Not met: AG suppliers consult users in creation or assessment

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.4	Procedures related to the mechanism(s)/channel(s) are publicly available and explained	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: Response timescales Not met: How complainants will be informed Score 2 <ul style="list-style-type: none"> Not met: Escalation to senior/independent level
C.5	Commitment to non-retaliation over complaints or concerns made	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: Public statement prohibiting retaliation Not met: Practical measures to prevent retaliation Score 2 <ul style="list-style-type: none"> Not met: Has not retaliated in practice Not met: Expects AG suppliers to prohibit retaliation
C.6	Company involvement with State-based judicial and non-judicial grievance mechanisms	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: Won't impede state based mechanisms Not met: Complainants not asked to waive rights Score 2 <ul style="list-style-type: none"> Not met: Will work with state based or non judicial mechanisms Not met: Example of issue resolved (if applicable)
C.7	Remedying adverse impacts and incorporating lessons learned	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: Describes how remedy has been provided: The Company describes its change on donation policy for humanitarian purposes to Myanmar after concerns raised by Amnesty International that the donation may have been made to the Myanmar military. However, this remedy described by the Company is not related to human rights on its own operation nor how the Company would remedy some issue identified through a grievance mechanism. [The Progress Updates Concerning The Letter From Amnesty International, 14/12/2018: kirinholdings.co.jp] Score 2 <ul style="list-style-type: none"> Not met: Says how it would remedy key sector risks Not met: Changes introduced to stop repetition Not met: Approach to learning from incident to prevent future impacts Not met: Evaluation of the channel/mechanism

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.1.1.b	Living wage (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"> Not met: Living wage in supplier code or contracts: The Company only mentioned guarantee of minimum wage. The Company also references to CHRB specifically to this indicator, but source provided was not material. [CSV Commitment: kirinholdings.co.jp] Score 2 <ul style="list-style-type: none"> Not met: Improving living wage practices of suppliers Not met: Both requirements under score 1 met Not met: Provides analysis of trends demonstrating progress
D.1.2	Aligning purchasing decisions with human rights	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: Avoids business model pressure on HRs (purchasing practices): The Company states that 'observe social norms and the letter and spirit of laws and regulations, and conduct business in a sensible and socially responsible manner'. However, does not describe the practices it adopts to avoid price or short notice requirements for its suppliers. [Policy on CSR Procurement: kirinholdings.co.jp & Activities to Promote CSR Procurement: kirinholdings.co.jp] Score 2 <ul style="list-style-type: none"> Not met: Positive incentives to respect human rights (purchasing practices) Not met: Both requirements under score 1 met
D.1.3	Mapping and disclosing the supply chain	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: Identifies suppliers back to manufacturing sites (factories or fields) Score 2 <ul style="list-style-type: none"> Not met: Discloses significant parts of SP and why

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"> Not met: Child Labour rules in codes or contracts: The Company states in its Supplier CSR Guidelines that its considerations of human rights include prohibition of forced labour and child labour. However, no evidence found on age verification guidelines and remediation programmes. [Policy on CSR Procurement: kirinholdings.co.jp] Not met: How working with suppliers on child labour Score 2 <ul style="list-style-type: none"> Not met: Both requirements under score 1 met Not met: Analysis of trends in progress made
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"> Not met: Debt and fees rules in codes or contracts Not met: How working with suppliers on debt & fees Score 2 <ul style="list-style-type: none"> Not met: Both requirements under score 1 met Not met: Analysis of trends in progress made
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"> Not met: Free movement rules in codes or contracts Not met: How working with suppliers on free movement Score 2 <ul style="list-style-type: none"> Not met: Both requirements under score 1 met Not met: Provides analysis of trends demonstrating progress
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"> Not met: FoA & CB rules in codes or contracts: Although there's evidence in relation to respecting the right of freedom of association and collective bargaining, no evidence found of requirements prohibiting retaliation or intimidation against union members or representatives. [Policy on CSR Procurement: kirinholdings.co.jp] Not met: How working with suppliers on FoA and CB Score 2 <ul style="list-style-type: none"> Not met: Both requirements under score 1 met Not met: Provides analysis of trends demonstrating progress
D.1.7.b	Health and safety: Fatalities, lost days, injury rates (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: Sets out clear Health and Safety requirements: Although there is a commitment to health and safety but no details found on health and safety requirements. [Policy on CSR Procurement: kirinholdings.co.jp] Not met: Injury Rate disclosures: The Company discloses about its injury rates for own operations. However, there is no description about injury rates for supply chain. [CSV, ESG data: kirinholdings.co.jp] Not met: Lost days or near miss disclosures: Kirin discloses about its lost time injury rate for own operations. However, there is no description about lost days or near miss for supply chain. [CSV, ESG data: kirinholdings.co.jp] Not met: Fatalities disclosure Score 2 <ul style="list-style-type: none"> Not met: How working with suppliers on H&S Not met: Provides analysis of trends demonstrating progress
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"> Not met: Rules on land & owners in codes or contracts Not met: How working with suppliers on land issues Score 2 <ul style="list-style-type: none"> Not met: Both requirements under score 1 met Not met: Provides analysis of trends demonstrating progress
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"> Not met: Rules on water stewardship in codes or contracts: The Company discloses about its programs to preserve natural resources but does not disclose about requirements to suppliers about the right water and sanitation requirements, including refraining from negatively affecting access to safe water, in its contractual arrangements (or supplier code). [Environmental Report, 2018: kirinholdings.co.jp]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not met: How working with suppliers on water stewardship issues Score 2 <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met • Not met: Provides analysis of trends demonstrating progress
D.1.10.b	Women's rights (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"> • Not met: Women's rights in codes or contracts • Not met: How working with suppliers on women's rights Score 2 <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met • Not met: Provides analysis of trends demonstrating progress

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
E(1).0	Serious allegation No 1		<ul style="list-style-type: none"> • Headline: Japanese authorities urged to investigate Kirin over donations made by subsidiary to Myanmar military during ethnic cleansing in Rakhine State • Area: Right to Security • Story: In June 2018, Amnesty International called on the Japanese government to conduct an investigation into payments made by a subsidiary of Kirin Holdings to the Myanmar military during the peak of the ethnic cleansing campaign carried out against the Rohingya population in late 2017. Amnesty alleges that Kirin Holding Company's subsidiary Myanmar Brewery made three donations totaling USD \$30,000 to the Myanmar authorities between 1 September and 3 October 2017. Although the intended purpose of the donations was to help victims of the violence, Amnesty claims the first donation was made at a televised ceremony in the capital Nay Pyi Taw, where staff of Myanmar Brewing gave a donation of USD \$6,000 to the Commander-in Chief of Myanmar's armed forces, Senior General Min Aung Hlaing. According to Amnesty, General Min Aung Hlaing allegedly said that the donations would go in part toward "security personnel" operating in Rakhine State. In a letter from Nobuhiko Hori, the Deputy Director of Group Corporate Communications at Kirin Holdings, to Amnesty International, Mr Hori said that the two subsequent donations consisted of rice and cooking oil and money that was given directly to local volunteers in Sittawe and thus shouldn't be considered comparable to the first donation given by Myanmar Brewing. Kirin owns a 55% stake in Myanmar Brewing, which it purchased in 2015. • Sources: [Amnesty International - 14/06/2018: amnesty.ca] [The Guardian - 15/06/2018: theguardian.com] [Box (Kirin correspondence with Amnesty) - 13/06/2018: app.box.com] [Daily Mail (via AFP) - 14/06/2018: dailymail.co.uk]
E(1).1	The Company has responded publicly to the allegation	2	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Public response available: The company responds publicly to the allegations through a statement to the Guardian newspaper and to the Agence France-Presse. [Daily Mail article (Myanmar), 14/06/2018: dailymail.co.uk & Guardian article (Myanmar): theguardian.com] Score 2 <ul style="list-style-type: none"> • Met: Response goes into detail: In a statement to the Guardian newspaper Kirin Holding Company said: "The company takes human rights and the allegations seriously, and is planning to improve the donation process. While this investigation is ongoing, all corporate donations in Myanmar have been halted". Additionally in comments reported by the Agence France-Presse, spokesman Nobuhiko Hori said members of the military were present during the first of the three donation rounds but said they believed the money was for relief. The second and third donations -- which included cooking supplies -- were handed directly to victims, he said. "We're taking seriously (the allegation) that we didn't sufficiently trace the money," he said, adding Kirin was halting any future funding pending the investigation. [Daily Mail article (Myanmar), 14/06/2018: dailymail.co.uk & Guardian article (Myanmar): theguardian.com]
E(1).2	The Company has appropriate policies in place	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Company policies address the general issues raised: The company in its Human Rights policy says "We understand that our business activities may have direct or indirect human rights impacts at every stage in the value chain, from R&D and procurement of raw materials to consumption/use of our products and services. We are committed to respecting human rights as set out in the International Bill of Human Rights and the International Labour Organization's

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Declaration on Fundamental Principles and Rights at Work." [Human Rights Policy, 09/02/2018: kirinholdings.co.jp]</p> <ul style="list-style-type: none"> • Met: Policies apply to the type of business relationships involved: The company in its Human Rights policy says "This policy applies to all the executives and employees - including part-time, dispatch and contract workers - of the Kirin Group, which constitutes Kirin Holdings Company, Limited and its consolidated subsidiaries...We expect that all of our business partners adhere to this policy. The Kirin Group will work to make our suppliers aware of this Policy, and we expect their compliance." [Human Rights Policy, 09/02/2018: kirinholdings.co.jp] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Policies address the specific rights in question: The company does not have a policy committing it to respect International Humanitarian Law.
E(1).3	The Company has taken appropriate action	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Engages with affected stakeholders: There is no publicly available evidence that the company has engaged with the Rohingya people and victims of the Myanmar army's military operations in Rakhine state. In a letter to Amnesty International, addressing the issue of the financial donation made to the Myanmar army, the President and CEO of Kirin Holdings, Yoshinori Isozaki says "We were told that the donations would be sent to victims of the conflict in Rakhine, and we did not sufficiently pursue details of which vehicle would ultimately be responsible for doing so. We understood from follow-up enquiries that the Rakhine State government distributed the funds." However this isn't engagement with the affected stakeholders. [Kirin CEO letters to Amnesty International, 22/05/2018] • Not met: Encourages linked business to engage affected stakeholders: In a letter to Amnesty International, addressing the issue of the financial donation made to the Myanmar army, the President and CEO of Kirin Holdings, Yoshinori Isozaki says "Kirin is preparing to conduct a Human Rights Impact Assessment of Myanmar Brewery's suppliers and business partners in Myanmar. We have control over operations managed or engaged in by Myanmar Brewery, but there are limits to the extent we can directly influence the activities of business partners outside of the joint venture. As such, under our Group Human Rights Policy we will continue to seek the understanding and support of MEHL for our human rights policy". This is not sufficient encouragement of Myanmar Brewing to engage with affected stakeholders. [Kirin CEO letters to Amnesty International, 22/05/2018] • Not met: Provides remedies to affected stakeholders: There is no publicly available evidence that remedy has been provided to the Rohingya people and victims of the Myanmar army's military operations in Rakhine state. • Met: Has reviewed management systems to prevent recurrence: In a letter to Amnesty International, addressing the issue of the financial donation made to the Myanmar army, the President and CEO of Kirin Holdings, Yoshinori Isozaki says, "We have initiated a re-assessment of the entire donation process, from request and collection to publicity and distribution to beneficiaries....This lack of traceability is one of the key issues we plan to address in our revised process, which will also include a closer assessment of the different organizations that may be available to provide effective aid....we intend to improve our donation assessment by putting in place a more rigorous and defined process to assess the nature and appropriateness of the organization managing the donations, the purpose of the donations, and how donated funds will be used and publicized. The company has reviewed its process for providing donations. [Kirin CEO letters to Amnesty International, 22/05/2018] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Remedies are satisfactory to the victims: There is no publicly available evidence that remedy has been provided to the Rohingya people and victims of the Myanmar army's military operations in Rakhine state. • Met: Has improved systems and engaged affected stakeholders: The company has conducted a human rights impact assessment in Myanmar. Additionally in a letter to Amnesty International, addressing the issue of the financial donation made to the Myanmar army, the President and CEO of Kirin Holdings, Yoshinori Isozaki says, "We are putting in place a timeframe to address these points of concern in a new donation process. The revised process will include a provision that our donations must be traceable, and if funds cannot be tracked then we will select alternative audited channels that fulfil our tracing criteria. [Kirin CEO letters to Amnesty International, 22/05/2018]

F. Transparency (10% of Total)

Indicator Code	Indicator name	Score	Explanation
F.1	Company willingness to publish information	1.05 out of 4	Out of a total of 42 indicators assessed under sections A-D of the benchmark, Kirin Holdings Company made data public that met one or more elements of the methodology in 11 cases, leading to a disclosure score of 1.05 out of 4 points.
F.2	Recognised Reporting Initiatives	2 out of 2	The individual elements of the assessment are met or not as follows: Score 2 <ul style="list-style-type: none"> • Met: Company reports on GRI: The Company states that it has website prepared in accordance with the Core option of the Global Reporting Initiative (GRI) Sustainability Reporting Standards, which includes necessary data. [GRI Standards Content Index: kirinholdings.co.jp] • Not met: Company reports on SASB • Not met: Company reports on UNGPRF
F.3	Key, High Quality Disclosures	0 out of 4	Kirin Holdings Company 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"> • Not met: Score 2 for A.2.2 : Board discussions • Not met: Score 2 for B.1.6 : Monitoring and corrective actions • Not met: Score 2 for C.1 : Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers • Not met: Score 2 for C.3 : Users are involved in the design and performance of the channel(s)/mechanism(s) Discussing challenges openly <ul style="list-style-type: none"> • Not met: Score 2 for B.2.4 : Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts • Not met: Score 2 for C.7 : Remedying adverse impacts and incorporating lessons learned Demonstrating a forward focus <ul style="list-style-type: none"> • Not met: Score 2 for A.2.3 : Incentives and performance management • Not met: Score 2 for B.1.2 : Incentives and performance management

Disclaimer

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

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

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