

**Company Name** Kohl's  
**Industry** Apparel (Supply Chain only)  
**Overall Score (\*)** 10.5 out of 100

Theme Score	Out of	For Theme
0.8	10	A. Governance and Policies
3.2	25	B. Embedding Respect and Human Rights Due Diligence
0.0	15	C. Remedies and Grievance Mechanisms
3.3	20	D. Performance: Company Human Rights Practices
2.1	20	E. Performance: Responses to Serious Allegations
1.1	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	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Not met: General HRs commitment</li> <li>Not met: UNGC principles 1 &amp; 2</li> <li>Not met: UDHR</li> <li>Not met: International Bill of Rights</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Not met: UNGPs</li> <li>Not met: OECD</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>Not met: ILO Core: The Company's Ethical Standards (Code of Conduct) explicitly covers non-discrimination and health and safety, but does not mention child and forced labour, freedom of association not Collective Bargaining. [Ethical Standards and Responsibilities, 2015: <a href="http://corporate.kohls.com">corporate.kohls.com</a>]</li> <li>Not met: UNGC principles 3-6</li> <li>Met: Explicitly list ALL four ILO for AP suppliers: The Company's Terms of Engagement for Business Partners (Terms of Engagement) covers all 4 core ILOs in addition to health and safety and working hours. With respect freedom of association and collective bargaining, the Company indicates: 'Workers must be free to join organizations of their own choice. Business Partners shall recognize and respect the rights of workers to freedom of association and collective bargaining'. [Terms of Engagement: <a href="http://corporate.kohls.com">corporate.kohls.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Explicit commitment to All four ILO Core</li> <li>• Met: Respect H&amp;S of workers: See above [Ethical Standards and Responsibilities, 2015: <a href="http://corporate.kohls.com">corporate.kohls.com</a>]</li> <li>• Met: H&amp;S applies to AP suppliers: See above [Terms of Engagement: <a href="http://corporate.kohls.com">corporate.kohls.com</a>]</li> <li>• Not met: working hours for workers</li> <li>• Not met: Working hours for AP suppliers: See above. Specifically: 'Subject to the requirements of local law, a regularly scheduled workweek of no more than sixty (60) hours and one day off in every seven (7) day period are encouraged.' However, this is not aligned with the international standards, which dictate a regularly scheduled workweek should not exceed 48 hours, 60 with overtime. [Terms of Engagement: <a href="http://corporate.kohls.com">corporate.kohls.com</a>]</li> </ul>
A.1.3.AP	Commitment to respect human rights particularly relevant to the industry (AP)	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: Women's Rights: The Company states the following in its Terms of Engagement with supplier: 'Women's Rights: All Business Partners will ensure that workers who are women receive equal treatment in all aspects of employment. Pregnancy tests will not be a condition of employment or continuation thereof and pregnancy testing, to the extent it is provided, will be voluntary and at the option of the worker. Workers will not be exposed to hazards that may endanger their reproductive health and Business Partners will not force workers to use contraception.' [Terms of Engagement: <a href="http://corporate.kohls.com">corporate.kohls.com</a>]</li> <li>• Not met: Children's Rights</li> <li>• Not met: Migrant worker's rights</li> <li>• Met: Expecting suppliers to respect these rights: See above [Terms of Engagement: <a href="http://corporate.kohls.com">corporate.kohls.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: Respecting the right to water</li> <li>• Not met: Expecting suppliers to respect these rights</li> </ul>
A.1.4	Commitment to engage with stakeholders	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Commits to stakeholder engagement: The Company states in its CSR 2017: 'We recognize the need to partner with others in order to create innovative solutions that drive our company forward in the long term and reduce our carbon footprint in the process. As a company, we look for ways to make sustainable choices easy for our customers and associates.' However, its stakeholder engagement approach is only related with the environment and do not have a clear commitment. It has not identified its potentially and actually affected stakeholders including local community on HR issues. [Corporate Responsibility Report, 2017: <a href="http://corporate.kohls.com">corporate.kohls.com</a> &amp; Corporate Responsibility Report 2018, 2019: <a href="http://corporate.kohls.com">corporate.kohls.com</a>]</li> <li>• Not met: Regular stakeholder engagement</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Commits to engage stakeholders in design</li> <li>• Not met: Regular stakeholder design engagement</li> </ul>
A.1.5	Commitment to remedy	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Commits to remedy</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Not obstructing access to other remedies</li> <li>• Not met: Collaborating with other remedy initiatives</li> <li>• Not met: Work with AP suppliers to remedy impacts</li> </ul>
A.1.6	Commitment to respect the rights of human rights defenders	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Zero tolerance attacks on HRs Defenders (HRDs)</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Expects AP 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	<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: CEO or Board approves policy</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <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: Part of the performance evaluation of the CEO (20% of the weighting) consists in 'other managerial criteria', which includes social responsibility and enhancing diversity among other issues. No evidence found of additional details. No specific reference to health and safety [2018 Proxy Statement, 2018: <a href="http://corporate.kohls.com">corporate.kohls.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: At least one key AP HR risk, beyond employee H&amp;S</li> <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	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 ILO core conventions</li> <li>• Not met: Senior responsibility for HR: In its CSR Report, the Company indicates: 'Our Social Responsibility Committee guides the overall direction, assessment and continual improvement of our compliance program. The committee consists of senior leadership and executives responsible for business operations from many departments, including merchants, product development, legal, risk and compliance, and the global trade compliance departments, as well as executives directly responsible for the day-to-day efforts of our social compliance program.' However, its Ethical Standards and Responsibilities (Code of Conduct) does not cover all ILO core and therefore senior responsibility subindicator cannot be awarded. [Corporate Responsibility Report, 2017: <a href="http://corporate.kohls.com">corporate.kohls.com</a> &amp; Corporate Responsibility Report 2018, 2019: <a href="http://corporate.kohls.com">corporate.kohls.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Met: Day-to-day responsibility: See above</li> <li>• Met: Day-to-day responsibility for AP in supply chain: It also indicates: 'As part of the global trade compliance department, a team of dedicated compliance associates is responsible for day-to-day administration of the social compliance program. This team is independent of the product development and merchandising departments. As a result, day-to-day decisions regarding the social compliance status of potential and existing factories that are being used to produce our proprietary brand merchandise are made by associates not involved in the actual purchase negotiation.' Its Term of Engagement with Suppliers (Vendor Code) does cover all ILO core. [Corporate Responsibility Report, 2017: <a href="http://corporate.kohls.com">corporate.kohls.com</a> &amp; Corporate Responsibility Report 2018, 2019: <a href="http://corporate.kohls.com">corporate.kohls.com</a>]</li> </ul>
B.1.2	Incentives and performance management	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Senior manager incentives for human rights</li> <li>• Not met: At least one key AP HR risk, beyond employee H&amp;S</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Performance criteria made public</li> </ul>
B.1.3	Integration with enterprise risk management	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Met: HR risks is integrated as part of enterprise risk system: In its CSR Report, the Company indicates: ' Our Policy conveys our requirement and expectation of social compliance to our vendor partners in order to minimize human rights risks from operations throughout our supply chain'. In addition, in its 10K Form 2017 / Annual Report, the Company include HR issues as operational risks: 'The reputation of the Kohl's brand or our proprietary brands could be damaged [...] Damage to the reputations (whether or not justified) of the Kohl's brand, our proprietary brand names or any affiliated individuals, could arise from product failures; concerns about human rights, working conditions and other labor rights and conditions</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>where merchandise is produced; perceptions of our pricing and return policies; litigation; vendor violations of our Terms of Engagement; or various other forms of adverse publicity, especially in social media outlets. Damage to our reputation may result in a reduction in sales, earnings, and shareholder value'. [Corporate Responsibility Report 2018, 2019: <a href="http://corporate.kohls.com">corporate.kohls.com</a> &amp; Annual Report 2017, 2017: <a href="http://corporate.kohls.com">corporate.kohls.com</a>]</p> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Audit Ctte or independent risk assessment</li> </ul>
B.1.4.a	Communication /dissemination of policy commitment(s) within Company's own operations	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Commits to ILO core conventions</li> <li>• Not met: Communicates its policy to all workers in own operations: The Company indicates in the Proxy statement that, in addition to provide training on the code for employees, all of them 'agree in writing to comply with the code at the time they are hired and periodically thereafter'. The code, however, does not cover all ILO core areas. The Company does not clarify to whether it has been translated into other languages. [2018 Proxy Statement, 2018: <a href="http://corporate.kohls.com">corporate.kohls.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Commits to all 4 ILO core conventions</li> <li>• Not met: Communication of policy commitments to stakeholder: See above</li> <li>• Not met: How policy commitments are made accessible to audience: See above</li> </ul>
B.1.4.b	Communication /dissemination of policy commitment(s) to business relationships	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Commits to all 4 ILO core conventions for suppliers</li> <li>• Met: Communicating policy down the whole AP supply chain: In relation to its ethics policy which included commitment to all ILOs applicable to suppliers and BR, the Company states the following: 'We communicate these policies to our vendor partners during vendor meetings, through business correspondence and via our vendor portal. New proprietary brand vendors receive packets that include further information, along with a Certification of Compliance with All Legal Obligations form, to be signed and returned by a principal of the vendor partner. Kohl's Terms of Engagement and Kohl's Purchase Order Terms and Conditions also emphasize the importance of the topics described in this report.' In addition, in its Term of Engagement, the Company indicates: 'Business Partners shall not utilize subcontractors for the production of Kohl's merchandise, or components thereof, without Kohl's prior written approval and only after the subcontractor has agreed to comply with Kohl's Terms of Engagement. Business Partners shall require each Kohl's approved subcontractor to abide by the Terms of Engagement. Business Partners shall be held accountable for a subcontractor's failure to abide by Kohl's Terms of Engagement'. [Corporate Responsibility Report 2018, 2019: <a href="http://corporate.kohls.com">corporate.kohls.com</a> &amp; Terms of Engagement: <a href="http://corporate.kohls.com">corporate.kohls.com</a>]</li> <li>• Met: Requiring AP suppliers to communicate policy down the chain: See above. In addition, in its Term of Engagement, the Company indicates: 'Kohl's strongly encourages Business Partners to exceed these Terms of Engagement and promote best practices and compliance by Business Partners with the Terms of Engagement in all factories in which they manufacture merchandise.' [Terms of Engagement: <a href="http://corporate.kohls.com">corporate.kohls.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: How HR commitments made binding/contractual: See above [Terms of Engagement: <a href="http://corporate.kohls.com">corporate.kohls.com</a>]</li> <li>• Met: Including on AP suppliers: See above</li> </ul>
B.1.5	Training on Human Rights	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Scores at least 1 on A.1.2</li> <li>• Not met: Trains all workers on HR policy commitments: The Company indicates in the proxy statement that it provides training with respect to the code for all employees, however, it does not cover all ILO core areas. [2018 Proxy Statement, 2018: <a href="http://corporate.kohls.com">corporate.kohls.com</a>]</li> <li>• Not met: Trains relevant AP managers including procurement</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: Both requirements under score 1 met</li> </ul>
B.1.6	Monitoring and corrective actions	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Scores at least 1 on A.1.2</li> <li>• Not met: Monitoring implementation of HR policy commitments: The Company describes the following: 'We retain the services of three professional, independent, third-party firms to monitor vendor partner compliance with our Policy. Our</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>monitors have auditing professionals located in the territories in which the manufacturing facilities are located who are able to speak the language of workers and management, and who have extensive experience with monitoring social compliance on behalf of international customers. Completion of our full audit program requires a two day visit, while follow-up audits are completed in one day. Factories are inspected for compliance on an annual basis, and undergo follow-up monitoring visits and training when issues are noted. We reserve the right to review all vendor partner facilities and conduct unannounced on-site inspections of manufacturing facilities. Once deemed compliant with our Policy, factories are monitored periodically based on their risk level.'</p> <p>However, the Company's policy for its owned operations, does not cover all ILOs. [Corporate Responsibility Report, 2017: <a href="http://corporate.kohls.com">corporate.kohls.com</a> &amp; Corporate Responsibility Report 2018, 2019: <a href="http://corporate.kohls.com">corporate.kohls.com</a>]</p> <ul style="list-style-type: none"> <li>• Met: Monitoring AP suppliers: See above. In addition, the Company's Terms of Engagement with Suppliers does cover all ILO core. [Corporate Responsibility Report 2018, 2019: <a href="http://corporate.kohls.com">corporate.kohls.com</a> &amp; Terms of Engagement: <a href="http://corporate.kohls.com">corporate.kohls.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 AP supply chain monitored: In its CSR Report 2017, the Company indicates: 'In 2017, there were 1,960 monitoring visits to 1,392 facilities; 41 percent of these were unannounced. At fiscal 2017 year-end, 80 percent of facilities were deemed compliant.' However, the Company does not disclose the percentage of supply chain monitored. [Corporate Responsibility Report, 2017: <a href="http://corporate.kohls.com">corporate.kohls.com</a>]</li> </ul>
B.1.7	Engaging business relationships	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: HR affects AP selection of suppliers: In its CSR Report, the Company states: 'We recognize that publication of our Policy is only one part of achieving compliance and that active enforcement of our Policy is required. To achieve this goal, we select vendor partners who share our commitment to the principles contained in our Policy, monitor our vendor partners' compliance efforts, and exercise our ability to take corrective action when necessary. We believe in working closely with our vendor partners to identify and address challenges in a responsible manner that considers the needs and expectations of the affected vendor partner, its suppliers, employees and our shareholders.' [Corporate Responsibility Report, 2017: <a href="http://corporate.kohls.com">corporate.kohls.com</a> &amp; Corporate Responsibility Report 2018, 2019: <a href="http://corporate.kohls.com">corporate.kohls.com</a>]</li> <li>• Met: HR affects on-going AP supplier relationships: In addition, the Company indicates: 'Our compliance philosophy focuses on continual improvement; however, we have zero tolerance regarding egregious violations of our Policy. The following violations of our Policy will result in immediate termination of our business relationship with the factory, and merchandise produced under such conditions will not be accepted: Child labor, prison labor, forced labor, bonded; labor, slavery or human trafficking; Physical or sexual abuse; Non-payment of wages; Unauthorized subcontracting; Ethical standards: attempted bribery of social; compliance or quality assurance auditors; Transshipment or altering/tampering with country-of-origin markings.' [Corporate Responsibility Report, 2017: <a href="http://corporate.kohls.com">corporate.kohls.com</a> &amp; Corporate Responsibility Report 2018, 2019: <a href="http://corporate.kohls.com">corporate.kohls.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Both requirement under score 1 met</li> <li>• Not met: Working with AP 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 AP SC engaged</li> <li>• Not met: Communities in the AP 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	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Identifying risks in own operations</li> <li>• Not met: Identifying risks in AP suppliers</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Ongoing global risk identification</li> <li>• Not met: In consultation with stakeholders</li> <li>• Not met: In consultation with HR experts</li> <li>• Not met: Triggered by new circumstances</li> </ul>
B.2.2	Assessing: Assessment of risks and impacts identified (salient risks and key industry risks)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Salient risk assessment (and context)</li> <li>• Not met: Public disclosure of salient risks</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> </ul>
B.2.3	Integrating and Acting: Integrating assessment findings internally and taking appropriate action	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Action Plans to mitigate risks</li> <li>• Not met: Including in AP supply chain</li> <li>• Not met: Example of Actions decided</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 AP 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	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Channel accessible to all workers</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Number grievances filed, addressed or resolved</li> <li>• Not met: Channel is available in all appropriate languages</li> <li>• Not met: Expect AP supplier to have equivalent grievance systems</li> <li>• Not met: Opens own system to AP supplier workers</li> </ul>
C.2	Grievance channel(s)/mechanism(s) to receive complaints or concerns from	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Grievance mechanism for community</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Describes accessibility and local languages</li> <li>• Not met: Expects AP supplier to have community grievance systems</li> <li>• Not met: AP supplier communities use global system</li> </ul>



Indicator Code	Indicator name	Score (out of 2)	Explanation
	external individuals and communities		
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"> <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> <li>• Not met: Provides user engagement example on performance</li> <li>• Not met: AP suppliers consult users in creation or assessment</li> </ul>
C.4	Procedures related to the mechanism(s)/channel(s) are publicly available and explained	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Response timescales</li> <li>• Not met: How complainants will be informed</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Escalation to senior/independent level</li> </ul>
C.5	Commitment to non-retaliation over complaints or concerns made	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Public statement prohibiting retaliation</li> <li>• Not met: Practical measures to prevent retaliation</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Has not retaliated in practice</li> <li>• Not met: Expects AP suppliers to prohibit retaliation</li> </ul>
C.6	Company involvement with State-based judicial and non-judicial grievance mechanisms	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Won't impede state based mechanisms</li> <li>• Not met: Complainants not asked to waive rights</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Will work with state based or non judicial mechanisms</li> <li>• Not met: Example of issue resolved (if applicable)</li> </ul>
C.7	Remedying adverse impacts and incorporating lessons learned	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Describes how remedy has been provided</li> <li>• Not met: Says how it would remedy key sector risks</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Changes introduced to stop repetition</li> <li>• Not met: Approach to learning from incident to prevent future impacts</li> <li>• Not met: Evaluation of the channel/mechanism</li> </ul>

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.2.1.b	Living wage (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Living wage in supplier code or contracts: Although the Company states in its Terms of Engagement for Business Partners that 'Kohl's recognizes that wages are essential to meet workers' basic needs. Kohl's will seek and favour Business Partners who are committed to the betterment of wages and benefits within their facilities.', there is no reference to Living Wages. [Terms of Engagement: <a href="https://www.kohls.com/corporate">corporate.kohls.com</a>]</li> <li>• Not met: Improving living wage practices of suppliers</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> <li>• Not met: Provide analysis of trends demonstrating progress</li> </ul>
D.2.2	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"> <li>• Not met: Avoids business model pressure on HRs</li> <li>• Not met: Positive incentives to respect human rights</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> </ul>
D.2.3	Mapping and disclosing the supply chain	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Identifies suppliers back to product source</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			Score 2 • Not met: Discloses significant parts of supply chain and why
D.2.4.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 • Not met: Child Labour rules in codes or contracts: Use of child labor is strictly prohibited. Business Partners must observe all legal requirements for the work of authorized minors, particularly those relating to hours of work, wages, minimum education and working conditions.' However, the Company does not disclose how the verification of the applicant's age is processed. [Terms of Engagement: <a href="http://corporate.kohls.com">corporate.kohls.com</a> ] • Not met: How working with suppliers on child labour Score 2 • Not met: Both requirements under score 1 met • Not met: Provide analysis of trends demonstrating progress
D.2.5.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 • Not met: Debt and fees rules in codes or contracts • Not met: How working with suppliers on debt & fees Score 2 • Not met: Both requirements under score 1 met • Not met: Provide analysis of trends in progress made
D.2.5.d	Prohibition on forced labour: Restrictions on workers (in the supply chain)	1	The individual elements of the assessment are met or not as follows: Score 1 • Met: Free movement rules in codes or contracts: In the section about Prison Labor/Forced Labor in its Terms of Engagement for BP, the Company states: 'Business Partners will not use or permit the use of bonded labor, indentured labor, prison labor or Forced Labor in the manufacture or finishing of products ordered by Kohl's. Nor will Kohl's knowingly purchase materials from a Business Partner utilizing bonded labor, indentured labor, prison labor or Forced Labor.' The Company also adds 'An employer involuntarily keeping workers identification documents is prohibited'. The Company's Terms of Engagement (Our Policy) 'spell out expectations to our vendor partners regarding wages and benefits, working hours, prohibiting the use of child or forced labor (which includes, without limitation, prison and slave labor, or human trafficking for those purposes), discrimination, disciplinary practices, women's rights, legally-protected rights of workers to free association, health and safety issues, and more. Our Policy conveys our requirement and expectation of social compliance to our vendor partners in order to minimize human rights risks from operations throughout our supply chain'. [Terms of Engagement: <a href="http://corporate.kohls.com">corporate.kohls.com</a> & Become a Supplier: <a href="http://corporate.kohls.com">corporate.kohls.com</a> ] • Not met: How these practices are implemented and monitored for agencies, labour brokers or recruiters Score 2 • Not met: Both requirements under score 1 met • Not met: Provide analysis of trends in progress made
D.2.6.b	Freedom of association and collective bargaining (in the supply chain)	1	The individual elements of the assessment are met or not as follows: Score 1 • Met: FoA & CB rules in codes or contracts: In its Terms of Engagement for BP, the Company indicates: 'Workers must be free to join organizations of their own choice. Business Partners shall recognize and respect the rights of workers to freedom of association and collective bargaining. Workers shall not be subject to intimidation or harassment in the peaceful exercise of their legal right to join or to refrain from joining an Organization.' [Terms of Engagement: <a href="http://corporate.kohls.com">corporate.kohls.com</a> ] • Not met: How working with suppliers on FoA and CB Score 2 • Not met: Both requirements under score 1 met • Not met: Provide analysis of trends in progress made



Indicator Code	Indicator name	Score (out of 2)	Explanation
D.2.7.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: Its Terms of Engagement for BP include a section about Health and Safety, where it states: 'Kohl's will only utilize Business Partners who provide workers with a clean, safe and healthful work environment designated to prevent accidents and injuries arising out of or occurring while in the course of work or as a result of the operation of a Business Partner's facility. All Business Partners must comply with all applicable, legally mandated standards for workplace health and safety. Where applicable, Business Partners who provide residential facilities for their workers must provide safe and healthy facilities, separate from production facilities, that comply with legally mandated standards for health and safety.' However, there is no clear requirements or guidelines. [Terms of Engagement: <a href="https://www.kohls.com/corporate">corporate.kohls.com</a>]</li> <li>• Not met: Injury rate disclosures</li> <li>• Not met: Lost days or near miss disclosures</li> <li>• Not met: Fatalities disclosures</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: How working with suppliers on H&amp;S</li> <li>• Not met: Provide analysis of trends in progress made</li> </ul>
D.2.8.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>• Met: Women's rights in codes or contracts: In its Terms of Engagement for Business Partners, the Company indicates: 'All Business Partners will ensure that workers who are women receive equal treatment in all aspects of employment. Pregnancy tests will not be a condition of employment or continuation thereof and pregnancy testing, to the extent it is provided, will be voluntary and at the option of the worker. Workers will not be exposed to hazards that may endanger their reproductive health and Business Partners will not force workers to use contraception.' [Terms of Engagement: <a href="https://www.kohls.com/corporate">corporate.kohls.com</a>]</li> <li>• Not met: How working with suppliers on women's rights</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Both requirement under score 1 met</li> <li>• Not met: Provide analysis of trends in progress made</li> </ul>
D.2.9.b	Working hours (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Working hours in codes or contracts: Kohl's expects its Business Partners to operate based on prevailing local work hours. Except in extraordinary circumstances, Business Partners shall limit the number of hours that workers may work on a regularly scheduled basis to the legal limit on regular and overtime hours established by local laws and regulations in the jurisdiction in which they manufacture. Subject to the requirements of local law, a regularly scheduled workweek of no more than sixty (60) hours and one day off in every seven (7) day period are encouraged. Partners will comply with applicable laws that entitle workers to vacation time, leave periods and holidays. Business Partners must regularly provide reasonable rest periods and one day off within a seven-day period. Any time worked over the norm for the area should be compensated as prescribed by the local labor laws. Working hours must be recorded by an automated timekeeping system. Whenever a worker is present in a facility, the worker's time must be recorded and the worker properly compensated. This applies to both regular and overtime working hours and any time used for work preparations or repairs.' However, this is not aligned with the international standards, which dictate a regularly scheduled workweek should not exceed 48 hours, 60 with overtime. This statement does not represent a clear commitment with international standards, as it only encourages its BP, and is also often based on legal minimum standards. [Terms of Engagement: <a href="https://www.kohls.com/corporate">corporate.kohls.com</a>]</li> <li>• Not met: How working with suppliers on working hours</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> <li>• Not met: Provide analysis of trends in progress made</li> </ul>

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
E(1).0	Serious allegation No 1		No allegations meeting the CHRB severity threshold were found, and so the score of 8.40 out of 80 points scored in themes A-D & F has been applied to produce a score of 2.10 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	1.1 out of 4	Out of a total of 40 indicators assessed under sections A-D of the benchmark, Kohl's made data public that met one or more elements of the methodology in 11 cases, leading to a disclosure score of 1.1 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	Kohl's 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 Benchmark. Before acting on anything contained in this material, you should consider whether it is suitable to your particular circumstances and, if necessary, seek professional advice. The material in the Benchmark has been put together solely according to the CHRB methodology and not any other assessment models in operation within any of the project partners or EIRIS Foundation as provider of the analyst team.

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

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

As CHRB Ltd, we want to emphasise that the results will always be a proxy for good human rights management, and not an absolute measure of performance. This is because there are no fundamental units of measurement for

human rights. Human rights assessments are therefore necessarily more subjective than objective. The Benchmark also captures only a snap shot in time. We therefore want to encourage companies, investors, civil society and governments to look at the broad performance bands that companies are ranked within rather than their precise score because, as with all measurements, there is a reasonably wide margin of error possible in interpretation. We also want to encourage a greater analytical focus on how scores improve over time rather than upon how a company compares to other companies in the same industry today. The spirit of the exercise is to promote continual improvement via an open assessment process and a common understanding of the importance of the UN Guiding Principles on Business and Human Rights.