

Corporate Human Rights Benchmark 2018 Company Scoresheet



Company Name Macy's
Industry Apparel (Supply Chain only)
Overall Score (*) 4.1 out of 100

Theme Score	Out of	For Theme
0.2	10	A. Governance and Policies
2.7	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
0.8	20	E. Performance: Responses to Serious Allegations
0.4	10	F. Transparency

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

Please note also that the "Not met" labels in the Explanation boxes below do not necessarily mean that the company does not meet the requirements as they are described in the bullet point short text. Rather, it means that the analysts could not find information *in public sources* that met the requirements *as described in full* in the CHRB 2018 Methodology document. For example, a "Not met" under "General HRs Commitment", which is the first bullet point for indicator A.1.1, does not necessarily mean that the company does not have a general commitment to human rights. Rather, it means that the CHRB could not identify a public statement of policy in which the company commits to respecting human rights.

Detailed assessment

A. Governance and Policies (10% of Total)

A.1 Policy Commitments (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1.1	Commitment to respect human rights	0	The individual elements of the assessment are met or not as follows: Score 1 • Not met: General HRs commitment: The company indicates that they have been a long-time corporate sponsor of the Human Rights Campaign (HRC). "In addition to supporting annual galas and auctions, this April we hosted the HRC's Workplace Equality Summit at our Cincinnati headquarters. Again this year, HRC awarded us a perfect score of 100 percent on the HRC 2017 Corporate Equality Index" However no formal commitment to respect HR has been found [Report on Social Responsibility, 2017: macysinc.com] • Not met: UNGC principles 1 & 2 • Not met: UDHR • Not met: International Bill of Rights Score 2 • Not met: UNGPs • Not met: OECD
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 • Not met: ILO Core • Not met: UNGC principles 3-6 • Met: All four ILO for AP suppliers: Macy's does require that suppliers commit to all four ILOs, health and safety and working hours. The vendor & supplier code of conduct lists 12 general principles that their suppliers must comply with, among them Child Labour, Forced Labour, Freedom of association and collective

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>bargaining and non-discrimination. [Vendor and Supplier Code of Conduct: macysinc.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Not met: All four ILO Core • Not met: Respect H&S of workers • Met: H&S applies to AP suppliers: Macy's requires suppliers to comply with the Supplier and Vendor Code of Conduct. The code contains a health and safety section where it indicates all the requisites suppliers must follow. [Vendor and Supplier Code of Conduct: macysinc.com] • Not met: working hours for employees • Met: Working hours for AP suppliers: The Supplier and Vendor Code of Conduct states that "As part of normal business hours, suppliers' factories should be working toward achieving a 60-hour work week on a regular basis. Employees shall not work more than 72 hours per 6 days or work more than a maximum total of 14 hours per a continuous 24 hour period and should limit this to peak periods. Workers shall not be asked or required to take work home or off premises and must be permitted one full day off per each seven day week." And "It is understood that overtime is often required in the manufacturing process. In addition to compensation for regular hours of work, workers must be compensated for overtime hours at such a premium rate as legally required or, in countries where there is no legal standard, at industry standards. In no event shall this be at a rate less than the regular hourly rate. Factories shall carry out operations in ways that limit overtime to a level that ensures productive and humane working conditions." [Vendor and Supplier Code of Conduct: macysinc.com]
A.1.3.AP	Commitment to respect human rights particularly relevant to the industry (AP)	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: Expecting 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: Respecting the right to water • Not met: Expecting suppliers to respect these rights: The Supplier code of conduct indicates that free potable water should be reasonably accessible to all workers throughout the working day. However no evidence has been found of a commitment to respect the rest of the rights. [Vendor and Supplier Code of Conduct: macysinc.com]
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"> • Not met: Commits to stakeholder engagement [Report on Social Responsibility, 2017: macysinc.com] • Not met: Regular stakeholder engagement: Macy's, conducts annual employee engagement survey across every function of the company. "We use the feedback we receive to develop strategies and action plans to both realize opportunities and address concerns." However no evidence found of a regular engagement with other affected or potentially affected stakeholders. <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Commits to engage stakeholders in design • Not met: Regular stakeholder design engagement
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"> • Not met: Commits to remedy: The company indicates that they are part of the "Alliance for Bangladesh worker safety" that has made notable accomplishments in the areas of inspection, remediation, worker training and empowerment and finance. Moreover the company states that factories new to Macy's are encouraged to carry a third party audits, and those in need of remediation are asked to arrange additional consultation services. However no evidence has been found of a policy statement of commitment to remedy adverse impacts caused by the Company or to which it has contributed. [Report on Social Responsibility, 2017: macysinc.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Not obstructing access to other remedies • Not met: Collaborating with other remedy initiatives • Not met: Work with AP suppliers to remedy impacts

Indicator Code	Indicator name	Score (out of 2)	Explanation
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 • Not met: Zero tolerance attacks on HRs Defenders (HRDs) Score 2 • Not met: Expects AP 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	0	The individual elements of the assessment are met or not as follows: Score 1 • Not met: CEO or Board approves policy • Not met: Board level responsibility for HRs Score 2 • Not met: Speeches/letters by Board members or CEO
A.2.2	Board discussions	0	The individual elements of the assessment are met or not as follows: Score 1 • Not met: Board/Committee review of salient HRs • Not met: Examples or trends re HR discussion 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 AP 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	0	The individual elements of the assessment are met or not as follows: Score 1 • Not met: Senior responsibility fo HR (inc ILO) Score 2 • Not met: Day-to-day responsibility • Not met: Day-to-day responsibility 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 AP 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 part of enterprise risk system 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 • Not met: Communicates its policy to all workers in own operations Score 2 • Not met: Communication of policy commitments to stakeholder • Not met: How policy commitments are made accessible to audience
B.1.4.b	Communication /dissemination of policy commitment(s) to business relationships	2	The individual elements of the assessment are met or not as follows: Score 1 • Met: Steps to communicate policy commitments to BRs: The Company states in its vendor code that "a copy of this Vendor/Supplier Code of Conduct, translated into the native languages of the workforce, should be prominently displayed within each facility where Macy's merchandise is being manufactured" [Vendor and Supplier Code of Conduct: macysinc.com] • Met: Including to AP suppliers: The code for suppliers states that "all subcontractors must be disclosed to Macy's prior to production, and all subcontractors and facilities must be pre-approved by Macy's. Any subcontractor

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>retained by a Macy's supplier must be in compliance with this Code of Conduct and each of Macy's suppliers is responsible for ensuring its subcontractor's compliance". [Vendor and Supplier Code of Conduct: macysinc.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Met: How HR commitments made binding/contractual: The Code for suppliers states that "Each of Macy's suppliers must sign and return Macy's Terms of Engagement Letter acknowledging that they have received a copy of Macy's Statement of Corporate Policy and this Code of Conduct and are in compliance. Acceptance of Macy's purchase orders and shipment of merchandise to Macy's represents a continuing affirmation of compliance". [Vendor and Supplier Code of Conduct: macysinc.com] • Met: Including on AP suppliers: The code for suppliers states that "all subcontractors must be disclosed to Macy's prior to production, and all subcontractors and facilities must be pre-approved by Macy's. Any subcontractor retained by a Macy's supplier must be in compliance with this Code of Conduct and each of Macy's suppliers is responsible for ensuring its subcontractor's compliance". [Vendor and Supplier Code of Conduct: macysinc.com]
B.1.5	Training on Human Rights	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Trains all workers on HR policy commitments • Met: Trains relevant managers including procurement: The social responsibility report indicates that: "The social compliance team trains all new product development hires on Vendor Code standards and principles [which include all ILO], supplier and factory approval processes, supply chain risks such as human trafficking and child labor, and Macy's Private Brand engagement with industry initiatives." [Report on Social Responsibility, 2017: macysinc.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met
B.1.6	Monitoring and corrective actions	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: Monitoring implementation of HR policy commitments: In order to get any Score under this indicator, the human rights policy commitment must include the ILO core labour standards at a minimum. • Not met: Monitoring AP suppliers <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Describes corrective action process • Not met: Example of corrective action • Not met: Discloses % of supply chain monitored
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"> • Met: HR affects selection of suppliers: The company indicates that the Vendor/Supplier Code of Conduct sets forth the commitment of Macy's to do business only with those manufacturers and suppliers that share its commitment to fair and safe labor practices. The report on social responsibility states that "Before conducting business with a new factory, our independent third-party monitor performs thorough audits. Free On Board (FOB) suppliers – those with whom we directly contract – undergo a combined Vendor Code and Security audit. Landed Duty Paid (LPD) suppliers – typically U.S.-based companies that source overseas or in the United States – undergo Vendor Code audit. In every case, suppliers must meet or exceed our minimum standards before being approved for production and enrolled in our merchandise order system'. [Report on Social Responsibility, 2017: macysinc.com] • Met: HR affects on-going supplier relationships: The social responsibility report indicates that "if our auditors identify a High Risk violation at a factory, the response may include removing the factory and/or supplier from our data base or some other type of immediate response". The Company discloses the number of factories terminated and that fell under the "the High Risk category". [Report on Social Responsibility, 2017: macysinc.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Both requirement under score 1 met • Not met: Working with 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 the SP engaged • Not met: communities in the SC engaged

Indicator Code	Indicator name	Score (out of 2)	Explanation
			Score 2 • 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	The individual elements of the assessment are met or not as follows: Score 1 • Not met: Identifying risks in own operations • Not met: Identifying risks in AP suppliers: Although the Company conducts due diligence prior to production with each factory, no evidence found of the Company carrying out a general due diligence process to identify which are the general human rights risks that it faces on a general basis in relation to its supply chain. [Report on Social Responsibility, 2017: macysinc.com] Score 2 • Not met: Ongoing global risk identification • Not met: In consultation with stakeholders • Not met: In consultation with HR experts • Not met: Triggered by new circumstances
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 • Not met: Salient risk assessment (and context) • Not met: Public disclosure of salient risks Score 2 • Not met: Both requirements under score 1 met
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 • Not met: Action Plans to mitigate risks • Not met: Example of Actions decided • Not met: Including in AP supply chain Score 2 • 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 • Not met: System to check if Actions are effective • Not met: Lessons learnt from checking effectiveness Score 2 • 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 • Not met: Comms plan re identifying risks • 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 AP suppliers Score 2 • 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 • Not met: Channel accessible to all workers: The company is a member of the Alliance for Bangladesh Worker Safety and through this alliance all factories have been provided with access to a confidential helpline. However no evidence has been found that this mechanism is accessible to all workers. [Report on Social Responsibility, 2017: macysinc.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			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 AP supplier to have equivalent grievance systems • Not met: Opens own system to AP 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 AP supplier to have community grievance systems • Not met: AP 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: AP suppliers consult users in creation or assessment
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 • Not met: Says how it would remedy key sector risks Score 2 <ul style="list-style-type: none"> • 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.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"> • Not met: Living wage in supplier code or contracts: The company indicates that "Employers should recognize that wages are essential to meeting their employees' basic needs. Employers shall pay workers for all work completed and shall pay at least the minimum wage required by law or the prevailing industry wage, whichever is higher, and shall provide legally mandated benefits." However no evidence has been found of guidelines to determine living wages in the S&V Code of Conduct. [Vendor and Supplier Code of Conduct: macysinc.com] Score 2 <ul style="list-style-type: none"> • Not met: Improving living wage practices of suppliers

Indicator Code	Indicator name	Score (out of 2)	Explanation
			Score 2 <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met • Not met: Provide analysis of trends in progress made
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"> • Not met: Avoids business model pressure on HRs • Not met: Positive incentives to respect human rights Score 2 <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met
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"> • Not met: Identifies suppliers back to product source (farm, ranch etc) Score 2 <ul style="list-style-type: none"> • Not met: Discloses significant parts of supply chain and why
D.2.4.b	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 provides child labour guidelines in relation to age verification: "All facilities are required to maintain official documentation in order to verify each worker's date of birth, as well as appropriate records documenting that the employer adheres to all restrictions under local laws that apply to juvenile workers'. However, no evidence found in relation to remediation programmes. [Vendor and Supplier Code of Conduct: macysinc.com] Score 2 <ul style="list-style-type: none"> • Not met: How working with suppliers on child labour • Not met: Both requirements under score 1 met • Not met: Provide analysis of trends in progress made
D.2.5.b	Forced labour: Debt bondage and other unacceptable financial costs (in the supply chain)	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: Provide analysis of trends in progress made
D.2.5.d	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 these practices are implemented and monitored for agencies, labour brokers or recruiters Score 2 <ul style="list-style-type: none"> • 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)	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: The company indicates in the S&VCoC that is to be signed by all suppliers that "Suppliers should respect the rights of employees to lawfully associate or not to associate with groups of their choosing, as long as such groups are legal in the country where the merchandise is manufactured. Suppliers should not interfere with, obstruct or prevent legitimate related activities." . However, this is not a sufficient commitment to FoA as it is only based on legal requirements [Vendor and Supplier Code of Conduct: macysinc.com] Score 2 <ul style="list-style-type: none"> • Not met: How working with suppliers on FoA and CB • Not met: Both requirements under score 1 met • Not met: Provide analysis of trends in progress made
D.2.7.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 • Not met: Injury rate disclosures • Not met: Lost days or near miss disclosures • Not met: Fatalities disclosures Score 2 <ul style="list-style-type: none"> • Not met: How working with suppliers on H&S • Not met: Provide analysis of trends in progress made
D.2.8.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

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not met: How working with suppliers on women's rights Score 2 <ul style="list-style-type: none"> • Not met: Both requirement under score 1 met • Not met: Provide analysis of trends in progress made
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"> • Not met: Working hours in codes or contracts: The V&SCoC that is to be signed by suppliers indicates that "As part of normal business hours, suppliers' factories should be working toward achieving a 60-hour work week on a regular basis. Employees shall not work more than 72 hours per 6 days or work more than a maximum total of 14 hours per a continuous 24 hour period and should limit this to peak periods. Workers shall not be asked or required to take work home or off premises and must be permitted one full day off per each seven day week." These levels are not consistent with ILO core hours. [Vendor and Supplier Code of Conduct: macysinc.com] Score 2 <ul style="list-style-type: none"> • Not met: How working with suppliers on working hours • Not met: Both requirements under score 1 met • Not met: Provide analysis of trends in progress made

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
E(1).0	Serious allegation No 1		No allegations meeting the CHRB severity thresholds were found, and so the score of 3.28 out of 80 points scored in themes A-D & F has been applied to produce a score of 0.82 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	0.4 out of 4	Out of a total of 40 indicators assessed under sections A-D of the benchmark, Macy's made data public that met one or more elements of the methodology in 4 cases, leading to a disclosure score of 0.4 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"> • Not met: Company reports on GRI • Not met: Company reports on SASB • Not met: Company reports on UNGPRF
F.3	Key, High Quality Disclosures	0 out of 4	Macy'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"> • 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 2018 Key Findings report for more details of the research process.

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