

**Company Name** Mr Price  
**Industry** Apparel (Supply Chain only)  
**Overall Score (\*)** 15.1 out of 100

Theme Score	Out of	For Theme
2.3	10	A. Governance and Policies
1.4	25	B. Embedding Respect and Human Rights Due Diligence
2.9	15	C. Remedies and Grievance Mechanisms
3.9	20	D. Performance: Company Human Rights Practices
3.0	20	E. Performance: Responses to Serious Allegations
1.6	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: The Social, Ethics, Transformation and Sustainability Committee mandate includes the requirement for the Committee to monitor the Company's activities 'having regard to any relevant legislation, other legal requirements or prevailing codes of best practices'. These include the UNGC, however it does not make an explicit commitment to it, and the Company is not a signatory to the initiative. [Social, Ethics, Transformation and Sustainability Committee mandate, 11/2018: <a href="http://mrpricegroup.com">mrpricegroup.com</a>]</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>Met: ILO Core: In the Code of Conduct, the Company makes a commitment to a fair and healthy work environment, where it names, among other things, discrimination, forced labour, child labour, and freedom of association, including allowing 'representative groups to liaise directly with management on matters that affect them.' No explicit evidence found, however, of a commitment to respect the right to collective bargaining. [Code of Conduct, 20/11/2018: <a href="http://mrpricegroup.com">mrpricegroup.com</a>]</li> <li>Not met: UNGC principles 3-6</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Not met: Explicitly list ALL four ILO for AP suppliers: The Company's code of conduct also applies to partners including suppliers. It contains formal commitment in relation to child labour, forced labour, discrimination and freedom of association. No evidence found, however, of a commitment to respect the right to collective bargaining.</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Explicit commitment to All four ILO Core: As indicated above, the right to collective bargaining is not explicitly mentioned. [Code of Conduct, 20/11/2018: <a href="http://mrpricegroup.com">mrpricegroup.com</a>]</li> <li>• Met: Respect H&amp;S of workers: Part of the Company's Code of Conduct commits it to 'providing a work environment which is conducive to safety and good health.' [Code of Conduct, 20/11/2018: <a href="http://mrpricegroup.com">mrpricegroup.com</a>]</li> <li>• Met: H&amp;S applies to AP suppliers: The Company obligates its Partners to 'treat all their employees with respect and dignity, provide them with a safe and hygienic work environment and must contribute towards the development of their employees.' [Code of Conduct, 20/11/2018: <a href="http://mrpricegroup.com">mrpricegroup.com</a>]</li> <li>• Met: working hours for workers: The Company states that 'Working hours, excluding overtime, must be defined by contract, and shall not exceed 48 hours per week. Where no national laws are in place to govern working hours the standard as stipulated by the ILO should be adhered to.' [Code of Conduct, 20/11/2018: <a href="http://mrpricegroup.com">mrpricegroup.com</a>]</li> <li>• Met: Working hours for AP suppliers: See above [Code of Conduct, 20/11/2018: <a href="http://mrpricegroup.com">mrpricegroup.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>• Not met: Children's Rights</li> <li>• Met: Migrant worker's rights: The code states that 'Migrant associates [employees] have the same entitlement as local associates and migrant employees of partners [suppliers] should have the same entitlement'. [Code of Conduct, 20/11/2018: <a href="http://mrpricegroup.com">mrpricegroup.com</a>]</li> <li>• Met: Expecting suppliers to respect these rights: As indicated above, migrant employees of suppliers should have the same entitlements as locals. [Code of Conduct, 20/11/2018: <a href="http://mrpricegroup.com">mrpricegroup.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: The Code of Conduct explicit states that 'Partners shall provide their employees with access to clean toilet facilities and portable water.' However, respect the right to water needs to be in the context of respecting the human right to water. [Code of Conduct, 20/11/2018: <a href="http://mrpricegroup.com">mrpricegroup.com</a>]</li> <li>• Not met: Expecting suppliers to respect these rights</li> </ul>
A.1.4	Commitment to engage with stakeholders	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Commits to stakeholder engagement: The Company states that 'The Board retains oversight of stakeholder management, while the implementation and monitoring of stakeholder engagement is devolved to the various management teams within the Group.' They go on to describe engagement with shareholders, customers, associates [employees] and partners, and suppliers, giving descriptions on how they engage. They mention, communities, stating that although they 'have not listed the communities in which [they] operate... it is important to note that the Group acts in a responsible and compliant manner towards these stakeholders.' [Stakeholder engagement: <a href="http://mrpricegroup.com">mrpricegroup.com</a>]</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	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>

Indicator Code	Indicator name	Score (out of 2)	Explanation
	rights defenders		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	0.5	The individual elements of the assessment are met or not as follows: Score 1 • Not met: CEO or Board approves policy • Met: Board level responsibility for HRs: The Social, Ethics transformation and Sustainability committee is responsible for monitoring the Group's activities with regard to matters relating to 'labour and employment practices'. [Social, Ethics, Transformation and Sustainability Committee Report: <a href="http://mrpricegroup.com">mrpricegroup.com</a> ] Score 2 • Not met: Speeches/letters by Board members or CEO
A.2.2	Board discussions	1	The individual elements of the assessment are met or not as follows: Score 1 • Met: Board/Committee review of salient HRs: The Social Ethic transformation and sustainability committee has the duty of monitoring activities related to labour and employment practices and during the year one of the key matters considered by the committee is the oversight of the Group Business code of conduct and supplier code of conduct. [Social, Ethics, Transformation and Sustainability Committee mandate, 11/2018: <a href="http://mrpricegroup.com">mrpricegroup.com</a> & Social, Ethics, Transformation and Sustainability Committee Report: <a href="http://mrpricegroup.com">mrpricegroup.com</a> ] • 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: Commits to ILO core conventions • Not met: Senior responsibility for HR Score 2 • Not met: Day-to-day responsibility • Not met: Day-to-day responsibility for AP 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 risks is integrated as part of enterprise risk system: Under Key Risks in the Annual report, the Company mentions as a key issue 'Ethical business practices,' however no specific reference to human rights is made. [Annual report, 2018: <a href="http://mrpricegroup.com">mrpricegroup.com</a> ] 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	0.5	The individual elements of the assessment are met or not as follows: Score 1 • Not met: Commits to ILO core conventions • Met: Communicates its policy to all workers in own operations: The Company requires all employees and Partners to read and understand the Code of Conduct, and in some cases, complete an annual declaration stating that they still respect the matters in the Code. [Code of Conduct, 20/11/2018: <a href="http://mrpricegroup.com">mrpricegroup.com</a> ]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<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</li> <li>• Not met: How policy commitments are made accessible to audience</li> </ul>
B.1.4.b	Communication /dissemination of policy commitment(s) to business relationships	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Commits to all 4 ILO core conventions for suppliers</li> <li>• Not met: Communicating policy down the whole AP supply chain: The Company requires that all Partners read and adhere to the Code of Conduct, which includes its policy relating to human rights. The last part of the code consists in a signing paragraph with to fill the name of the suppliers, the formal commitments and the signature. However, no evidence of the Company communicating its policy further down the supply chain could be found. [Code of Conduct, 20/11/2018: <a href="http://mrpricegroup.com">mrpricegroup.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: How HR commitments made binding/contractual: The Code of Conduct serves as a binding document between the Company and its suppliers. As indicated above, is a document that needs to be signed including the commitments acknowledged by the supplier. [Code of Conduct, 20/11/2018: <a href="http://mrpricegroup.com">mrpricegroup.com</a>]</li> <li>• Not met: Including on AP suppliers</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</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	<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</li> <li>• Not met: Monitoring AP suppliers</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</li> </ul>
B.1.7	Engaging business relationships	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: HR affects AP selection of suppliers</li> <li>• Met: HR affects on-going AP supplier relationships: The Company states that a partner [supplier] has transgressed the code, 'then corrective measures will be implemented [...] and breach procedures, corrective action plans, penalties, reduced orders or contract termination'. 'Any non-compliance of this Code by partners will be deemed to be a material breach of any agreement or business arrangement and may result in the termination of the Group's relationship with the Partner'. [Code of Conduct, 20/11/2018: <a href="http://mrpricegroup.com">mrpricegroup.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both requirement under score 1 met</li> <li>• Not met: Working with 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	1.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Met: Channel accessible to all workers: The Company uses a third-party Whistleblowers Hotline, accessible to all employees and Partners, in order to investigate claims of contravention of the Code of Conduct. [Code of Conduct, 20/11/2018: <a href="http://mrpricegroup.com">mrpricegroup.com</a>]</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>• Met: Opens own system to AP supplier workers: The Code states that 'if an associate, partner [supplier] or anybody else suspects that there has been a contravention of the Code they should promptly and report this to the divisional Managing Director, Group Ethics Officer or call the Group's Whistleblowers Hotline'. [Code of Conduct, 20/11/2018: <a href="http://mrpricegroup.com">mrpricegroup.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.2	Grievance channel(s)/mechanism(s) to receive complaints or concerns from external individuals and communities	1.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Met: Grievance mechanism for community: The Whistleblowers Hotline is available to any 'Associate, Partner or anybody else [who] suspects that there has been a contravention of the Code.' There is also a link to the website under the 'Contact us' heading on the Company's website. [Code of Conduct, 20/11/2018: <a href="http://mrpricegroup.com">mrpricegroup.com</a> &amp; Contact us: <a href="http://mrpricegroup.com">mrpricegroup.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Met: Describes accessibility and local languages: The Hotline website is available in several languages, including English, isiZulu, French, Portuguese and Arabic. [Blow The Whistle Online - Whistle Blowers South Africa: <a href="http://whistleblowing.co.za">whistleblowing.co.za</a>]</li> <li>Not met: Expects AP supplier to have community grievance systems</li> <li>Not met: AP supplier communities use global system</li> </ul>
C.3	Users are involved in the design and performance of the channel(s)/mechanism(s)	0	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	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Met: Public statement prohibiting retaliation: The Company states in the Code of Conduct its commitment to non-retaliation against any person reporting. [Code of Conduct, 20/11/2018: <a href="http://mrpricegroup.com">mrpricegroup.com</a>]</li> <li>Not met: Practical measures to prevent retaliation: The Company states that 'disclosures will remain protected and confidential where this is requested, and there shall be no detriment suffered by any person reporting the contravention.' However, it is not clear how it prevents retaliation in practice. [Code of Conduct, 20/11/2018: <a href="http://mrpricegroup.com">mrpricegroup.com</a>]</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	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Living wage in supplier code or contracts: The Company states in the Code of Conduct that 'minimum legal wage requirements shall be adhered to,' but that is not sufficient to be considered a living wage, which should include basic needs for employee and family, and some discretionary income. [Code of Conduct, 20/11/2018: <a href="http://mrpricegroup.com">mrpricegroup.com</a>]</li> <li>• Not met: Improving living wage practices of suppliers</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> <li>• Not met: Provide analysis of trends demonstrating progress</li> </ul>
D.2.2	Aligning purchasing decisions with human rights	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Avoids business model pressure on HRs</li> <li>• Not met: Positive incentives to respect human rights</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> </ul>
D.2.3	Mapping and disclosing the supply chain	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Identifies suppliers back to product source</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Discloses significant parts of supply chain and why</li> </ul>
D.2.4.b	Prohibition on child labour: Age verification and corrective actions (in the supply chain)	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Child Labour rules in codes or contracts: The Code states that 'Partners shall not recruit child labour. Partners shall develop or participate in and contribute to policies and programmes which provide for the transition of any child found to be performing child labour to enable him or her to attend and remain in quality education until no longer a child; "child" and "child labour" being defined in line with the International Labour Organisation (ILO) standards'. However, no specific evidence found on requirements of mechanisms to verify age of job applicants. [Code of Conduct, 20/11/2018: <a href="http://mrpricegroup.com">mrpricegroup.com</a>]</li> <li>• Not met: How working with suppliers on child labour</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> <li>• Not met: Provide analysis of trends demonstrating progress</li> </ul>
D.2.5.b	Prohibition on forced labour: Debt bondage and other unacceptable financial costs (in the supply chain)	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Debt and fees rules in codes or contracts: The Company states that 'Involuntary labour of any kind shall not be used, including prison labour, debt bondage or forced labour by an external authority.' It goes on to say that Partners are expected to not require deposits from their employees. [Code of Conduct, 20/11/2018: <a href="http://mrpricegroup.com">mrpricegroup.com</a>]</li> <li>• Not met: How working with suppliers on debt &amp; fees</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> <li>• Not met: Provide analysis of trends in progress made</li> </ul>
D.2.5.d	Prohibition on forced labour: Restrictions on workers (in the supply chain)	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Free movement rules in codes or contracts: The Company expects Partners to not require the lodging of identity papers, and employees 'are free to leave their employment after giving the required notice,' and they 'may not be prevented from leaving any place of work under reasonable circumstances or the conclusion of the official shift.' [Code of Conduct, 20/11/2018: <a href="http://mrpricegroup.com">mrpricegroup.com</a>]</li> <li>• Not met: How these practices are implemented and monitored for agencies, labour brokers or recruiters</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> <li>• Not met: Provide analysis of trends in progress made</li> </ul>
D.2.6.b	Freedom of association and collective bargaining (in the supply chain)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: FoA &amp; CB rules in codes or contracts: While Freedom of Association is explicitly mentioned, Collective Bargaining is not explicitly included within requirements for suppliers, nor is there a prohibition of intimidation, harassment, etc. In the Code of Conduct. [Code of Conduct, 20/11/2018: <a href="http://mrpricegroup.com">mrpricegroup.com</a>]</li> <li>• Not met: How working with suppliers on FoA and CB</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			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>
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: The Code of Conduct states that Partners must provide their employees with 'a safe and hygienic work environment.' It goes on to include clean toilet facilities, portable water, food storage, and training. Also, 'Adequate steps must be taken to prevent accidents and injury to health.' [Code of Conduct, 20/11/2018: <a href="http://mrpricegroup.com">mrpricegroup.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)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Not met: Women's rights in codes or contracts</li> <li>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)	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Met: Working hours in codes or contracts: The Company includes in its Code of Conduct provisions ensuring the working hours of Partners' employees do not exceed 48 hours per week, and that the must comply with national laws or collective agreements, whichever allows greater protection for employees. The employees must be permitted 'at least one day off in every 7-day period or, where permitted by national law, 2 days in every 14-day period.' [Code of Conduct, 20/11/2018: <a href="http://mrpricegroup.com">mrpricegroup.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 12.11 out of 80 points scored in themes A-D & F has been applied to produce a score of 3.03 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	1.6 out of 4	Out of a total of 40 indicators assessed under sections A-D of the benchmark, Mr Price made data public that met one or more elements of the methodology in 16 cases, leading to a disclosure score of 1.6 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	Mr Price 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



Indicator Code	Indicator name	Score	Explanation
			<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.

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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.