

## Corporate Human Rights Benchmark 2018 Company Scoresheet



**Company Name** Nike  
**Industry** Apparel (Supply Chain only)  
**Overall Score (\*)** 33.7 out of 100

Theme Score	Out of	For Theme
2.8	10	A. Governance and Policies
8.8	25	B. Embedding Respect and Human Rights Due Diligence
0.0	15	C. Remedies and Grievance Mechanisms
11.1	20	D. Performance: Company Human Rights Practices
6.7	20	E. Performance: Responses to Serious Allegations
4.3	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	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: General HRs commitment: The Company has a section on its website devote to human rights where it explains its commitment to human rights and labour compliance standards: 'Nike supports human rights as defined by the Universal Declaration of Human Rights, which recognizes that "all human beings are born free and equal in dignity and rights". We work to elevate human potential through our products, partnerships and operations, something that cannot be accomplished without a fundamental respect for human rights throughout Nike's operations and our suppliers' operations'. [Human rights website, 07/2018: <a href="https://sustainability.nike.com">sustainability.nike.com</a>]</li> <li>Met: UDHR: See above [Human rights website, 07/2018: <a href="https://sustainability.nike.com">sustainability.nike.com</a>]</li> <li>Not met: International Bill of Rights</li> </ul> <p>Score 2</p> <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	<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: ILO Core [Code of ethics (inside the lines), 2011: <a href="https://s3.amazonaws.com">s3.amazonaws.com</a>]</li> <li>Not met: UNGC principles 3-6: The Company is a signatory to the Global Compact. However, no evidence found of a statement of commitment to the ten principles regarding its own operations. [BHRC Company action platform: <a href="https://business-humanrights.org">business-humanrights.org</a> &amp; Sustainable business report 14/15, 2016: <a href="https://s3.amazonaws.com">s3.amazonaws.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Met: All four ILO for AP suppliers: Nike's code of conduct includes its requirements for suppliers and explicitly contains respect rights related to forced labour, child labour, non- discrimination, freedom of association and collective bargaining. [Code of conduct, 09/2017: <a href="https://s3.amazonaws.com">s3.amazonaws.com</a>]</li> <li>Score 2</li> <li>• Not met: All four ILO Core: The Code of ethics contains a formal commitment regarding non-discrimination. [Code of ethics (inside the lines), 2011: <a href="https://s3.amazonaws.com">s3.amazonaws.com</a>]</li> <li>• Met: Respect H&amp;S of workers: The Code of ethics contains a formal commitment regarding health and safety [Code of ethics (inside the lines), 2011: <a href="https://s3.amazonaws.com">s3.amazonaws.com</a>]</li> <li>• Met: H&amp;S applies to AP suppliers: Nike's code of conduct includes its requirements for suppliers and explicitly contains health and safety of workers [Code of conduct, 09/2017: <a href="https://s3.amazonaws.com">s3.amazonaws.com</a>]</li> <li>• Not met: working hours for employees</li> <li>• Met: Working hours for AP suppliers: Nike's code of conduct includes its requirements for suppliers and explicitly contains working hours of workers [Code of conduct, 09/2017: <a href="https://s3.amazonaws.com">s3.amazonaws.com</a>]</li> </ul>
A.1.3.AP	Commitment to respect human rights particularly relevant to the industry (AP)	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: Women's Rights</li> <li>• Not met: Children's Rights</li> <li>• Not met: Migrant worker's rights</li> <li>• Not met: Expecting suppliers to respect these rights</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>• Met: Respecting the right to water: The Company is signatory to the CEO Water Mandate since 2010. [CEO water mandate website: <a href="https://ceowatermandate.org">ceowatermandate.org</a>]</li> <li>• Not met: Expecting suppliers to respect these rights: Although the Code of conduct contains a statement on minimizing freshwater withdrawals in the supply chain, no commitment found in the context of access to water or the right to water. [Code of conduct, 09/2017: <a href="https://s3.amazonaws.com">s3.amazonaws.com</a>]</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 Code of conduct (and similar commitment on website) states that 'we will partner with our suppliers as we continue to expand engagement with civil society, unions, governments, and with others in our industry and beyond to affect systemic change to labour, health and safety, and environmental condition in countries where we operate'. However, no evidence has been found in public sources of a commitment to engage potentially and actually affected stakeholders including in local communities and its operations. [Code of conduct, 09/2017: <a href="https://s3.amazonaws.com">s3.amazonaws.com</a> &amp; Industry partnerships on website, 07/2018: <a href="https://sustainability.nike.com">sustainability.nike.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: Although the Company has partnerships with different organisations, no evidence found of a formal commitment in relation to affected stakeholders and their legitimate representatives being involved in the development or monitoring of the Human rights approach.</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: Although the Company discloses information on how suppliers are required to remedy when non-compliances, and help in remediation efforts, no evidence found of the Company disclosing a statement of commitment to remedy the adverse impacts that it has caused or contributed to. [Code Leadership standards, 2017: <a href="https://s3.amazonaws.com">s3.amazonaws.com</a> &amp; Human rights website, 07/2018: <a href="https://sustainability.nike.com">sustainability.nike.com</a>]</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	1	The individual elements of the assessment are met or not as follows: Score 1 • Met: CEO or Board approves policy: The Company's code of ethics is signed by the Chairman. It does contain the Company's commitment on non-discrimination and safety. The company also has a formal human rights commitment stated on its sustainability report and signed by the CEO. [Code of ethics (inside the lines), 2011: <a href="https://s3.amazonaws.com">s3.amazonaws.com</a> ] • Met: Board level responsibility for HRs: The Corporate Responsibility & Sustainability Committee has, among its responsibilities, the following: 'Review and provide guidance to management on sustainability issues and impacts, and the integration of sustainability into NIKE's business, including innovation, product design, manufacturing and sourcing, and operations; Review, provide guidance to management, and report to the Board on sustainability (including labour practices) within NIKE's supply chain, and review reports of NIKE's sustainability audits' which includes human rights through the supplier's code. [Corporate responsibility & sustainability Committe on website: <a href="https://investors.nike.com">investors.nike.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 Corporate Responsibility, Sustainability & Governance committee charter indicates that the purpose of the Committee include review the Company's 'significant strategies, activities and policies regarding sustainability (including labor practices), and community impact and charitable activities, and make recommendations to the board'. The Committee will 'review code of business conduct and ethics' [which contains human rights commitments towards the Supply chain, and some ILO core regarding own operations], and will 'review, provide guidance to management, and report to the Board on sustainability (including labor practices) within NIKE's supply chain and review reports of NIKE's Sustainability audits'. [Committee charters on website, 07/2018: <a href="https://investors.nike.com">investors.nike.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	0.5	The individual elements of the assessment are met or not as follows: Score 1 • Not met: Senior responsibility fo HR (inc ILO): In relation to executive-level position with responsibility for social topics, the Sustainable business reports refers to Hanna Jones, NIKE Chief Sustainability Officer & VP Innovation Accelerator. This person, together with other executive officers represent the Company's Performance & Disclosure Committee, which meets regularly 'to review sustainability targets, performance and disclosures'. The Company's policies in relation to the supply chain include all ILO core areas. However, no evidence found of policies covering all ILO core for its own operations. [Sustainable business report 14/15, 2016: <a href="https://s3.amazonaws.com">s3.amazonaws.com</a> ]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Day-to-day responsibility: The Company indicates on its website that its core Sustainable Business &amp; Innovation team SB&amp;I team 'links sustainability and leadership across our value chain including innovation and product creation, sourcing and manufacturing, facilities, logistics and retail. We have also connected teams across Nike with a common sustainability vision. Specifically, we have sustainability-focused teams within Product Creation, Nike Direct, Global Sourcing &amp; Manufacturing, Supply Chain and Brand. These teams report to the leaders of those areas and coordinate directly with SB&amp;I through our Business Integration team'. However, it is not clear whether they deal with Human rights issues within the Company. [Sustainability governance on website, 07/2018: <a href="https://sustainability.nike.com">sustainability.nike.com</a>]</li> <li>• Met: Day-to-day responsibility in supply chain: The Company indicates on its website that its core Sustainable Business &amp; Innovation team SB&amp;I team 'links sustainability and leadership across our value chain including innovation and product creation, sourcing and manufacturing, facilities, logistics and retail. We have also connected teams across Nike with a common sustainability vision. Specifically, we have sustainability-focused teams within Product Creation, Nike Direct, Global Sourcing &amp; Manufacturing, Supply Chain and Brand. These teams report to the leaders of those areas and coordinate directly with SB&amp;I through our Business Integration team'. [Sustainability governance on website, 07/2018: <a href="https://sustainability.nike.com">sustainability.nike.com</a>]</li> </ul>
B.1.2	Incentives and performance management	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: Senior manager incentives for human rights</li> <li>• Not met: At least one key AP HR risk, beyond employee H&amp;S</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Performance criteria made public</li> </ul>
B.1.3	Integration with enterprise risk management	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: HR part of enterprise risk system: One of the risks identified in the 10K form is 'failure of our contractors or our licensees' contractors to comply with our code of conduct, local laws and other standards could harm our business'. However, no further details found in the context of how human rights risks are integrated as part of the broader enterprise risk management systems. On its website, human rights section, it also refers to some risks that may face as part of its supply chain activities, although no evidence found on whether these risks are integrated as part of the ERM, [10K form, 2017: <a href="https://s1.q4cdn.com">s1.q4cdn.com</a> &amp; Human rights website, 07/2018: <a href="https://sustainability.nike.com">sustainability.nike.com</a>]</li> </ul> <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: Communicates its policy to all workers in own operations</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <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	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: Steps to communicate policy commitments to BRs: The Code of conduct indicates that 'the supplier shall post this code, in the language(s) of its employees in all major workspaces, train employees on their rights and obligations as defined by this code and applicable country law, and ensure the compliance of any sub-suppliers producing Nike branded or affiliate products'. [Code of conduct, 09/2017: <a href="https://s3.amazonaws.com">s3.amazonaws.com</a>]</li> <li>• Met: Including to AP suppliers: See above [Code of conduct, 09/2017: <a href="https://s3.amazonaws.com">s3.amazonaws.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 indicates that 'as a condition of doing business with Nike, the supplier shall implement and integrate this Code and accompanying Code Leadership Standards and applicable laws into its business, including development of effective management systems, and submit to verification and monitoring'. Suppliers shall ensure the compliance of any sub-suppliers producing Nike branded or affiliate products. [Code of conduct, 09/2017: <a href="https://s3.amazonaws.com">s3.amazonaws.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Met: Including on AP suppliers: See above [Code of conduct, 09/2017: <a href="https://s3.amazonaws.com">s3.amazonaws.com</a>]</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: Trains all workers on HR policy commitments</li> <li>• Not met: Trains relevant managers including procurement</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <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: Monitoring implementation of HR policy commitments: 'Nike and independent organizations, including FLA and the Better Work Programme of the ILO, conduct audits of contract finished good factories to monitor compliance. Nike audits assess contract factory compliance with Nike's Code of conduct and protocols. The FLA and Better Work conduct independent audits on behalf of the I'. No evidence found, however, in relation to monitoring own operations. Also, no evidence found of the Company having policies covering all ILO core for its own operations. [Sustainable business report 14/15, 2016: <a href="https://s3.amazonaws.com">s3.amazonaws.com</a>]</li> <li>• Met: Monitoring AP suppliers: See above</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Describes corrective action process: In case of non-compliances, 'we investigate it immediately and, where improvements are required, we take a collaborative approach to working with the factory managers to see that corrective actions are taken, that problems are remediated and that the managers have on-site verification of this remediation. Should a supplier fail to remediate [...] it is subject to review and sanctions, including potential termination'. The Company also indicates that 'those failing to remediate issues prior to their next audit are placed on probation and re-audited six months later'. The Company discloses the percentage of incidents by category, no evidence found of the number of incidences (or number of times that the corrective action process was needed). [Sustainable business report 14/15, 2016: <a href="https://s3.amazonaws.com">s3.amazonaws.com</a>]</li> <li>• Not met: Example of corrective action</li> <li>• Not met: Discloses % of supply chain monitored: The Company discloses the total amount of audits carried out by its own teams, by the FLA and by Better Work. It also indicates that 100% of tier 1 suppliers were audited in 2016 and 2017. It is not clear, however, the total percentage of the supply chain that tier 1 suppliers represent. [Sustainable business report 14/15, 2016: <a href="https://s3.amazonaws.com">s3.amazonaws.com</a>]</li> </ul>
B.1.7	Engaging 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: HR affects selection of suppliers: The Company indicates that 'Every contract factory in our supply chain is subject to a rigorous set of compliance requirements. This starts with risk analysis of the host country and our code of conduct'. In addition, the Company has a tool to score factories on, among other factors, sustainability, including labour practices. This tool 'has become an important tool in factory selection, encouraging performance improvement, eliminating underperformance in factories and driving business to those that perform best'. Reaching a 'bronze rating' 'demonstrates factory compliance with our Code of Conduct and Code Leadership standards'. [Sustainable business report 14/15, 2016: <a href="https://s3.amazonaws.com">s3.amazonaws.com</a>]</li> <li>• Met: HR affects on-going supplier relationships: The Sustainable business report states that 'we source based on assessment of both our production needs and factory performance. Our Manufacturing Index (MI) [...] scores factories in sustainability - including labour practices - on a par with traditional metrics of cost, quality and on-time delivery. We assess the sustainability component through our SMSI and focus on bringing all factories to a bronze rating'. If the Company rating is below bronze and the factory doesn't improve or has serious compliance issues, 'we trigger our responsible exit process'. [Sustainable business report 14/15, 2016: <a href="https://s3.amazonaws.com">s3.amazonaws.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Both requirement under score 1 met: See above</li> <li>• Met: Working with suppliers to improve performance: The Company provides an example on working with contract factories 'to put in place comprehensive HSE management systems that focus on prevention, identification and elimination of hazards and risks to workers. It indicates that establishes a bar and expects contract factories to perform better and industry averages in injuries and lost-time accidents, and become self-governing in safety performance. As part of the process the Company collects data and validates performance data to set baselines and measure progress. [Sustainable business report 14/15, 2016: <a href="https://s3.amazonaws.com">s3.amazonaws.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
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: Although the Company discloses partnerships and involvement in initiatives with stakeholders, no evidence found of systems to identify affected stakeholders, or frequency and triggers for engagement on human rights by type or stakeholder group. [Sustainable business report 14/15, 2016: <a href="https://s3.amazonaws.com">s3.amazonaws.com</a>]</li> <li>• Not met: Frequency and triggers for engagement</li> <li>• Not met: workers in the SP engaged</li> <li>• Not met: communities in the 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	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: Identifying risks in own operations: The Company indicated it updated its 'assessment of the most relevant issues and megatrends facing our business, our industry and the world. Our process involved first identifying 400 possible issues and then applying a series of filters to distil the list down and focus on the areas that are most relevant to our business and our stakeholders, and that have the most significant environmental and socioeconomic impacts. The assessment confirmed what we have known for many years and aligned with insights from our foot printing work – that the two leading drivers of environmental and socioeconomic impacts across our value chain are the materials we use in our products and the outsourced manufacturing of those products'. [Sustainable business report 14/15, 2016: <a href="https://s3.amazonaws.com">s3.amazonaws.com</a>]</li> <li>• Met: Identifying risks in AP suppliers: See above</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Ongoing global risk identification: The Company indicates that it continued the analysis mentioned above in FY2017 with qualitative information: 'by combining the qualitative survey results with the quantitative analysis, we have been able to update our set of priority Corporate Responsibility &amp; Sustainability (CR&amp;S) issues'. [Sustainable Business report 16/17, 2018: <a href="https://sustainability-nike.s3.amazonaws.com">sustainability-nike.s3.amazonaws.com</a>]</li> <li>• Met: In consultation with stakeholders: For the qualitative analysis of priority issues, the Company indicates that in FY17 'we brought the voices of internal and external stakeholders into this analysis. We reached out to a wide range of stakeholders, including employees, NGOs, academics, investors, suppliers and corporate peers'. [Sustainable Business report 16/17, 2018: <a href="https://sustainability-nike.s3.amazonaws.com">sustainability-nike.s3.amazonaws.com</a>]</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)	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: Salient risk assessment (and context): The company discloses its human rights issues. However, it does not disclose the specific process to assess the risks, including how geographical, economic, social and other factors are taken into account. [Sustainable business report 14/15, 2016: <a href="https://s3.amazonaws.com">s3.amazonaws.com</a>]</li> <li>• Met: Public disclosure of salient risks: The Company defines its priority issues related to human rights, which include child labour, excessive overtime and freedom of association (including collective bargaining). [Sustainable Business report 16/17, 2018: <a href="https://sustainability-nike.s3.amazonaws.com">sustainability-nike.s3.amazonaws.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> </ul>
B.2.3	Integrating and Acting: Integrating assessment findings internally and taking appropriate action	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Action Plans to mitigate risks: The Company explains the situation and context of the three issues, and provides some examples of how it is working in relation to some of them in some locations with local examples. However, no evidence found of a global system or systematic approach to tackle all the three issues at all places where relevant. [Sustainable Business report 16/17, 2018: <a href="https://sustainability-nike.s3.amazonaws.com">sustainability-nike.s3.amazonaws.com</a>]</li> <li>• Met: Example of Actions decided: The Company describes overtime to be an issue found in its contract factories. The root causes in factories that are NIKE influenced are 'due to forecasting and capacity planning issues, shortened production timelines and seasonal spikes. The Company has established the commitment of</li> </ul>



Indicator Code	Indicator name	Score (out of 2)	Explanation
			aligning sourcing decisions to source from factories that don't use excessive overtime. In FY2015, 96% of contract factories had no incidents of excessive overtime violations'. 'The factories that reported excessive overtime were escalated to Global Sourcing and Manufacturing leadership review'. [Sustainable business report 14/15, 2016: <a href="http://s3.amazonaws.com">s3.amazonaws.com</a> ] <ul style="list-style-type: none"> <li>• Not met: Including in AP supply chain: The Company describes the process it follows to monitor and act in relation to its factories audits. However, no evidence found of a global system to take action to prevent, mitigate or remediate is salient issues.</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: Following monitoring the Company indicates that it 'has shown that the facilities where EOT [Excessive overtime] is most likely to occur tend to be factories that are multi-brand, where Nike represents a small percent of their overall production'. 'The biggest problems are underdeveloped management systems and a failure to enforce local laws on working hours'. It finally indicates that 'a low rate of repeat findings is what makes it so challenging to predict and anticipate where EOT will occur'. However, it seems that these lessons refer to the regular monitoring process and not to a specific action plan implemented to tackle this particular issue. [Sustainable Business report 16/17, 2018: <a href="http://sustainability-nike.s3.amazonaws.com">sustainability-nike.s3.amazonaws.com</a>]</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	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Met: Comms plan re identifying risks: As explained in indicator b.2.1, the Company explains in its sustainable business report the process it has followed to identify the different issues it faces and determine which are the priority issues specific to its activities. [Committee charters on website, 07/2018: <a href="http://investors.nike.com">investors.nike.com</a>]</li> <li>• Not met: Comms plan re assessing risks: However, the Company has indicates which are its priority issues, including excessive overtime, child labour and freedom of association. [Sustainable Business report 16/17, 2018: <a href="http://sustainability-nike.s3.amazonaws.com">sustainability-nike.s3.amazonaws.com</a>]</li> <li>• Not met: Comms plan re action plans for risks: However, the Company provides some examples of actions that is carrying out in relation to key issues. [Sustainable Business report 16/17, 2018: <a href="http://sustainability-nike.s3.amazonaws.com">sustainability-nike.s3.amazonaws.com</a>]</li> <li>• Not met: Comms plan re reviewing action plans</li> <li>• Met: Including AP suppliers: All the information publicly available (communicated) in relation to how human rights impacts are addressed refer to the Supply chain. [Sustainable Business report 16/17, 2018: <a href="http://sustainability-nike.s3.amazonaws.com">sustainability-nike.s3.amazonaws.com</a>]</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: The Company has an alert line disclosed in the Company's code of ethics for its operations. 'Alertline may be used to report any concern related to actual or potential violations of the law or Nike's code of ethics, and you may choose to remain anonymous'. However, for European, France, Spain and Portugal team members, 'Alertline may be used only to report issues relating to internal controls in the areas of finance, accounting, or banking, or relating to issues of competition or anti-corruption'. For these employees it also says that 'If your concern relates to an area other than finance, accounting, banking, competition, or anti-corruption, please report it to your local management team, local Legal or local Human Resources'. [Code of ethics (inside the lines), 2011: <a href="http://s3.amazonaws.com">s3.amazonaws.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> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Not met: Expect AP supplier to have equivalent grievance systems: Regarding suppliers, the Code Leadership Standards includes the requirements regarding grievance mechanisms that suppliers must implement and make available to their workers. No evidence found, however, of expectation of suppliers to convey the same expectation to their suppliers. [Code Leadership standards, 2017: <a href="https://s3.amazonaws.com">s3.amazonaws.com</a>]</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 external individuals and communities	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: Grievance mechanism for community</li> </ul> <p>Score 2</p> <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>
C.3	Users are involved in the design and performance of the channel(s)/mechanism(s)	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: Engages users to create or assess system</li> <li>• Not met: Description of how they do this</li> </ul> <p>Score 2</p> <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	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Response timescales</li> <li>• Not met: How complainants will be informed</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Escalation to senior/independent level</li> </ul>
C.5	Commitment to non-retaliation over complaints or concerns made	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: Public statement prohibiting retaliation: The Company code, 'Inside the lines', contains a commitment to no retaliation for employees 'Nike does not tolerate retaliation against any employee who reports in good faith a suspected violation of law or policy or who participates in any investigation of a suspected violation. Nike will investigate reports of retaliation and will take appropriate action to prevent future violations'. There is no evidence however, of commitment of no retaliation covering also other stakeholders, nor it describes how it ensures no retaliation (anonymity seems to be an option only for employees which are not from Europe, France, Spain and Portugal). [Code of ethics (inside the lines), 2011: <a href="https://s3.amazonaws.com">s3.amazonaws.com</a>]</li> <li>• Not met: Practical measures to prevent retaliation: See above</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Has not retaliated in practice</li> <li>• Not met: Expects AG suppliers to prohibit retaliation: The Code Leadership standards for suppliers contain requirements regarding grievance mechanisms for suppliers' workers including provisions against retaliation. However, no evidence found of requirements of channels being available to external stakeholders and their representatives and the provisions against retaliation being extensive to them. [Code Leadership standards, 2017: <a href="https://s3.amazonaws.com">s3.amazonaws.com</a>]</li> </ul>
C.6	Company involvement with State-based judicial and non-judicial grievance mechanisms	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Won't impede state based mechanisms</li> <li>• Not met: Complainants not asked to waive rights</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Will work with state based or non judicial mechanisms</li> <li>• Not met: Example of issue resolved (if applicable)</li> </ul>
C.7	Remedying adverse impacts and incorporating lessons learned	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Describes how remedy has been provided: Although the Company describes the approach regarding factories which have lower rates and indicates that it focuses on factories that 'demonstrated alignment with our standards and</li> </ul>



Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>aims', it does not describe the approach followed for remedying a specific human rights impact which it has caused or contributed to. [Sustainable business report 14/15, 2016: <a href="https://s3.amazonaws.com">s3.amazonaws.com</a>]</p> <ul style="list-style-type: none"> <li>• Not met: Says how it would remedy key sector risks</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Changes introduced to stop repetition</li> <li>• Not met: Approach to learning from incident to prevent future impacts</li> <li>• Not met: Evaluation of the channel/mechanism</li> </ul>

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.2.1.b	Living wage (in the supply chain)	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Living wage in supplier code or contracts: Regarding wages, the Code Leadership Standards states that 'Supplier acknowledges that every employee has a right to compensation for a regular work week that is sufficient to meet employees' basic needs and provide some discretionary income'. Employees are paid 'at least the minimum wage required by country law, or prevailing wage, whichever is higher'. However, no evidence found of the Company including living wage guidelines in contractual agreements. [Code Leadership standards, 2017: <a href="https://s3.amazonaws.com">s3.amazonaws.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Improving living wage practices of suppliers: The Company states that: 'Nike has set a FY20 target to work with factories to develop and test new compensation and benefits models for their workers that can be scaled in the supply chain'. It describes a pilot programme being carried out: 'At one apparel factory in Thailand we are testing different compensation models, enabling factory management to value their workers, increase wages and improve factory performance, and also to retain their talent, to attract the right skills and to develop their workforce. This work started in 2014 and is ongoing. Some initial insights have shown that even before incentive systems can be effective, stability on the lines, commitment from the factory leadership - to valuing its workers and to understanding the importance of this information for the future of manufacturing - and communications between factory management and workers are critical'. [Sustainable business report 14/15, 2016: <a href="https://s3.amazonaws.com">s3.amazonaws.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> <li>• Not met: Provide analysis of trends in progress made</li> </ul>
D.2.2	Aligning purchasing decisions with 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"> <li>• Not met: Avoids business model pressure on HRs</li> <li>• Met: Positive incentives to respect human rights: The Company has the objective of sourcing '100% of products from contract factories that meet our definition of sustainable by the end of FY20'. The Company describes as sustainable factories 'those that rate bronze or better on the Sustainable Manufacturing and Sourcing Index, demonstrating a beyond-compliance approach'. This tool 'has become an important tool in factory selection, encouraging performance improvement, eliminating underperformance in factories and driving business to those that perform best'. Reaching a 'bronze rating' 'demonstrates factory compliance with our Code of Conduct and Code Leadership standards'. If the Company rating is below this rate and the factory doesn't improve or has serious compliance issues 'we trigger our responsible exit process'. The Company also states that 'We are committed to prioritizing sourcing from factories that have eliminated excessive overtime. In FY15, 96% of contract factories had no incidents of excessive overtime violations'. [Sustainable business report 14/15, 2016: <a href="https://s3.amazonaws.com">s3.amazonaws.com</a>]</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	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: Identifies suppliers back to product source (farm, ranch etc): The Company indicates that 'this site is a tool to learn about the independent factories and material suppliers used to manufacture NIKE products – including the name and location of each factory and the types of products they produce'. [Nike manufacturing map: <a href="https://manufacturingmap.nikeinc.com">manufacturingmap.nikeinc.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Discloses significant parts of supply chain and why: The Company has a website where it discloses an interactive map including all its contract factory suppliers. Map includes names, addresses, employees and percentage of migrant and female workers. [Nike manufacturing map: <a href="https://manufacturingmap.nikeinc.com">manufacturingmap.nikeinc.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.2.4.b	Child labour: Age verification and corrective actions (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: Child Labour rules in codes or contracts: The Code Leadership Standard includes standards and requirements for suppliers in relation to child labour, including minimum age requirement, proof of age, remedying underage employment, and protecting young workers from hazardous conditions. No evidence found of the Company describing how it works with suppliers to eliminate these practices and improving working conditions for young workers where relevant.</li> <li>Not met: How working with suppliers on child labour</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>
D.2.5.b	Forced labour: Debt bondage and other unacceptable financial costs (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: Debt and fees rules in codes or contracts: The Code Leadership Standards contains guidelines regarding this issue: 'Neither the supplier, nor labour agents, may charge workers, or deduct from wages (by way of garnishments, levies, deposits, guarantee monies or otherwise) costs or fees associated with employment eligibility, including required visas, health checks, employment registration, work permit or recruitment agency/placement firm fees'. [Code Leadership standards, 2017: <a href="https://s3.amazonaws.com">s3.amazonaws.com</a>]</li> <li>Not met: How working with suppliers on debt &amp; fees</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Not met: Both requirements under score 1 met</li> <li>Not met: Provide analysis of trends in progress made</li> </ul>
D.2.5.d	Forced labour: Restrictions on workers (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: Free movement rules in codes or contracts: The Code Leadership standards includes requirements regarding freedom of movement within working areas during work hours and leaving facilities, and access to drinking water and toilet facilities. Regarding the retention of documents, it states: 'Employees shall not be required to turn over their original identity papers (such as passports, travel or residency permits, national IDs or school certificates) to their employer, labour agent or another party as a condition of employment, nor shall they be required to make 'deposits' to gain access to their documents'. In addition to these requirements, the Company also has other provisions for foreign workers (fair treatment, training in the language of the employee, etc.). [Code Leadership standards, 2017: <a href="https://s3.amazonaws.com">s3.amazonaws.com</a>]</li> <li>Not met: How these practices are implemented and monitored for agencies, labour brokers or recruiters: No evidence found in public sources of the Company describing how it works with suppliers to eliminate detention of worker's documents or other actions to physically restrict movement.</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>
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 <ul style="list-style-type: none"> <li>Met: FoA &amp; CB rules in codes or contracts: The Code Leadership Standards explicitly includes freedom of association and collective bargaining guidelines. It also states that 'The supplier must not threaten or use violence or the presence of policy or military to intimidate employees or to prevent, disrupt or break up any activities that constitute a lawful and peaceful exercise of the right of freedom of association, including union meetings, organizing activities, assemblies and lawful strikes'. In addition, 'no employee or prospective employee shall be subject to dismissal, discrimination, harassment, intimidation or retaliation for reason of membership in a union or worker association...'. [Code Leadership standards, 2017: <a href="https://s3.amazonaws.com">s3.amazonaws.com</a>]</li> <li>Not met: How working with suppliers on FoA and CB: Although it indicates that it signed the Freedom of Association protocol in Indonesia with other stakeholders to implement a framework for suppliers to support union activities, this refers to 2011. In addition, it states that it 2017 it joined the FLA with other stakeholders in advocating for legislative reforms in Mexico. [Sustainable Business report 16/17, 2018: <a href="https://sustainability-nike.s3.amazonaws.com">sustainability-nike.s3.amazonaws.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Not met: Both requirements under score 1 met</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>Not met: Provide analysis of trends in progress made: The Company indicates through a figure in its sustainable business report that it didn't have any findings or events related to Freedom of association (and collective bargaining) in the two last financial years. [Sustainable Business report 16/17, 2018: <a href="https://sustainability-nike.s3.amazonaws.com">sustainability-nike.s3.amazonaws.com</a>]</li> </ul>
D.2.7.b	Health and safety: Fatalities, lost days, injury rates (in the supply chain)	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>Met: Sets out clear Health and Safety requirements: The Code Leadership Standards contains a comprehensive section health and safety, including injury/illness system management: 'Each facility must keep a record of all work-related injuries and illnesses resulting in a fatality, hospitalization, lost workdays, medical treatment beyond first aid, job transfer or termination, or loss of consciousness for that factory'. Data must be reported to Nike on a quarterly basis, with the exception of factories with 10 or fewer workers. [Code Leadership standards, 2017: <a href="https://s3.amazonaws.com">s3.amazonaws.com</a>]</li> <li>Met: Injury rate disclosures: Total case incident rate for Tier 1 suppliers for the last two years. Also, it is compared for footwear, apparel and equipment segments with the industry level. [Sustainable Business report 16/17, 2018: <a href="https://sustainability-nike.s3.amazonaws.com">sustainability-nike.s3.amazonaws.com</a>]</li> <li>Met: Lost days or near miss disclosures: Lost time injury frequency rate for Tier 1 suppliers for the last 2 years. Also, it is compared for footwear, apparel and equipment segments with the industry level. [Sustainable Business report 16/17, 2018: <a href="https://sustainability-nike.s3.amazonaws.com">sustainability-nike.s3.amazonaws.com</a>]</li> <li>Not met: Fatalities disclosures</li> </ul> <p>Score 2</p> <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	<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 in codes or contracts: Regarding women's rights, the Code leadership standards includes requirements on safe work, pregnancy testing, contraception, and maternity leave. It also indicates that 'Women and men shall receive equal pay for work of equal value, equal evaluation of the quality of their work and equal opportunities to fill open positions'. [Code Leadership standards, 2017: <a href="https://s3.amazonaws.com">s3.amazonaws.com</a>]</li> <li>Not met: How working with suppliers on women's rights</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: Provide analysis of trends in progress made</li> </ul>
D.2.9.b	Working hours (in the supply chain)	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: Working hours in codes or contracts: Code of conduct (for suppliers) states that 'Suppliers shall not require workers to work more than the regular and overtime hours allowed by the law of the country where the workers are employed. The regular work week shall not exceed 48 hours. Suppliers shall allow workers at least 24 consecutive hours of rest in every seven-day period. All overtime work shall be consensual. Suppliers shall not request overtime on a regular basis and shall compensate all overtime work at a premium rate. Other than in extraordinary circumstances, the sum of regular and overtime hours in a week shall not exceed 60 hours'. [Code of conduct, 09/2017: <a href="https://s3.amazonaws.com">s3.amazonaws.com</a>]</li> <li>Not met: How working with suppliers on working hours</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>Not met: Both requirements under score 1 met</li> <li>Met: Provide analysis of trends in progress made: Regarding working hours, the report says that 'At 56% incidents overall, excessive hours was by far the top issue found in audits. We are committed to prioritizing sourcing from factories that have eliminated excessive overtime'. In FY15, 96% of contract factories had no incidents of excessive overtime violations'. 'The factories that reported excessive overtime violations were escalated to Global Sourcing and Manufacturing leadership review'. IN FY14, 54% incidents overall were due to excessive hours. [Sustainable business report 14/15, 2016: <a href="https://s3.amazonaws.com">s3.amazonaws.com</a>]</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 thresholds were found, and so the score of 26.98 out of 80 points scored in themes A-D & F has been applied to produce a score of 6.74 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	2.3 out of 4	Out of a total of 40 indicators assessed under sections A-D of the benchmark, Nike made data public that met one or more elements of the methodology in 23 cases, leading to a disclosure score of 2.3 out of 4 points.
F.2	Recognised Reporting Initiatives	2 out of 2	The individual elements of the assessment are met or not as follows: Score 2 <ul style="list-style-type: none"> <li>Met: Company reports on GRI: The Sustainable business report includes an index linking information provided to GRI standards and UNGC principles [Sustainable business report 14/15, 2016: <a href="https://s3.amazonaws.com">s3.amazonaws.com</a>]</li> </ul>
F.3	Key, High Quality Disclosures	0 out of 4	Nike 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 2018 Key Findings report 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.

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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.