

**Company Name** Page Industries  
**Industry** Apparel (Supply Chain and Own Operations)  
**Overall Score (\*)** 8.5 out of 100

Theme Score	Out of	For Theme
0.8	10	A. Governance and Policies
1.1	25	B. Embedding Respect and Human Rights Due Diligence
1.7	15	C. Remedies and Grievance Mechanisms
2.2	20	D. Performance: Company Human Rights Practices
1.7	20	E. Performance: Responses to Serious Allegations
1.0	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	<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: General HRs commitment: According to Principle 5 of Business Responsibility Report, Page Industries (PIL) "believes the human rights of its employees at work are an absolute requirement. PIL's policies on zero tolerance for discrimination and harassment are directed towards adherence to applicable laws and to uphold the spirit of human rights, as enshrined in existing standards such as Fundamental Rights as per the Constitution of India and national laws and policies. " However; "uphold the spirit of humans rights" is not a statement that shows formal commitment to respect human rights. [Business Responsibility Report, 01 Oct 2018: <a href="http://static01.jockeyindia.com">static01.jockeyindia.com</a>]</li> <li>Not met: UNGC principles 1 &amp; 2: Although according to Principle 5 of Business Responsibility Report, the Company supports the UNGC principles at some point, it does not have a publicly available statement of policy committing it to respecting the ten principles of UNGC.</li> <li>Not met: UDHR</li> <li>Not met: International Bill of Rights [Business Responsibility Report, 01 Oct 2018: <a href="http://static01.jockeyindia.com">static01.jockeyindia.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>Not met: UNGPs</li> <li>Not met: OECD</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1.2	Commitment to respect the human rights of workers	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: ILO Core: According to the Business Responsibility Report, the Company commits itself to respects the human rights that the ILO has declared to be fundamental rights at work. Child Labour, Forced Labour, Freedom of association, Collective bargaining, and Discrimination not allowed [Business Responsibility Report, 01 Oct 2018: <a href="http://static01.jockeyindia.com">static01.jockeyindia.com</a>]</li> <li>• Not met: UNGC principles 3-6</li> <li>• Met: Explicitly list ALL four ILO for AP suppliers: The supply chain standards explicitly include commitments in relation to child labour, forced labour and discrimination. With respect freedom of association and collective bargaining the document says: 'Supplier / Vendor shall ensure that all its employees have the right to (i) join or form association of their own choice and to bargain collectively for the promotion and defense of their occupational interests and (ii) choose not to join an association.' [Supply Chain Standard and Responsibility Code, 29 Mar 2019: <a href="http://static01.jockeyindia.com">static01.jockeyindia.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Explicit commitment to All four ILO Core: According to the Supply Chain Code, the Company commits itself to respects the human rights that the ILO has declared to be fundamental rights at work, Child Labour, Forced Labour and Discrimination not allowed. With respect freedom of association and collective bargaining, the Company indicates: 'Businesses should respect the right to freedom of association, participation, collective bargaining, and provide access to appropriate grievance redressal mechanisms. All employees have the right to join or form association of their own choosing and to bargain collectively for the promotion and defense of their occupational interests. They also have the right to choose not to join an association.' [Business Responsibility Report, 01 Oct 2018: <a href="http://static01.jockeyindia.com">static01.jockeyindia.com</a>]</li> <li>• Met: Respect H&amp;S of workers: According to Principle 6 of Business and Responsibility Report, the Company states that " Page Industries (PIL) is committed to protect the Environment, Health &amp; Safety of its employees, customers and the communities in and around our manufacturing hubs &amp; locations". [Business Responsibility Report, 01 Oct 2018: <a href="http://static01.jockeyindia.com">static01.jockeyindia.com</a>]</li> <li>• Met: H&amp;S applies to AP suppliers: According to the Supply Chain Code 'Supplier / vendor must recognize that workers deserve a safe and healthy work environment, and supplier shall, at a minimum, comply with applicable law regarding working conditions and with the standards in this Code'. [Supply Chain Standard and Responsibility Code, 29 Mar 2019: <a href="http://static01.jockeyindia.com">static01.jockeyindia.com</a>]</li> <li>• Not met: working hours for workers [Business Responsibility Report, 01 Oct 2018: <a href="http://static01.jockeyindia.com">static01.jockeyindia.com</a>]</li> <li>• Not met: Working hours for AP suppliers: According to the Supply Chain Code, 'Supplier shall ensure that working hours do not exceed the maximum permitted by law'. However, no further information related to breaks or resting periods was found [Supply Chain Standard and Responsibility Code, 29 Mar 2019: <a href="http://static01.jockeyindia.com">static01.jockeyindia.com</a>]</li> </ul>
A.1.3.AP	Commitment to respect human rights particularly relevant to the industry (AP)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <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>• Not met: Respecting the right to water</li> <li>• Not met: Expecting suppliers to respect these rights</li> </ul>
A.1.4	Commitment to engage with stakeholders	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: According to Business Responsibility Report, the Company states that "PIL believes that an effective stakeholder engagement process is necessary for achieving its sustainability goal of inclusive growth. PIL adopts a systematic approach to address the concerns of all its stakeholders, including employees, customers, suppliers, government and the society" [Business Responsibility Report, 01 Oct 2018: <a href="http://static01.jockeyindia.com">static01.jockeyindia.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>

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1.5	Commitment to remedy	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Not met: Commits to remedy: According to Principle 6 of Business Responsibility Report, the Company states that "we will minimize adverse impact on the environment and risks to the community across our value chain, during the production process, transportation, storage and distribution of our goods and services" However, no evidence found of a commitment to remedy adverse impacts (not only environment) that it has caused or contributed to. [Business Responsibility Report, 01 Oct 2018: <a href="http://static01.jockeyindia.com">static01.jockeyindia.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Not met: Not obstructing access to other remedies</li> <li>Not met: Collaborating with other remedy initiatives</li> <li>Not met: Work with AP suppliers to remedy impacts</li> </ul>
A.1.6	Commitment to respect the rights of human rights defenders	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Not met: Zero tolerance attacks on HRs Defenders (HRDs)</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Not met: Expects AP suppliers to reflect company HRD commitments</li> </ul>

## A.2 Policy Commitments (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.2.1	Commitment from the top	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Not met: CEO or Board approves policy: According to Principle 1 of Business Responsibility Report, a committee has been constituted under a senior-level manager only to review and address grievances regularly. No evidence found in relation with responsibility over policy commitments. [Business Responsibility Report, 01 Oct 2018: <a href="http://static01.jockeyindia.com">static01.jockeyindia.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Not met: Board level responsibility for HRs</li> <li>Not met: Speeches/letters by Board members or CEO</li> </ul>
A.2.2	Board discussions	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Not met: Board/Committee review of salient HRs</li> <li>Not met: Examples or trends re HR discussion</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Not met: Both examples and process</li> </ul>
A.2.3	Incentives and performance management	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Not met: Incentives for at least one board member</li> <li>Not met: At least one key AP HR risk, beyond employee H&amp;S</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Not met: Performance criteria made public</li> </ul>

## B. 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 <ul style="list-style-type: none"> <li>Not met: Commits to ILO core conventions</li> <li>Not met: Senior responsibility for HR</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Not met: Day-to-day responsibility</li> <li>Not met: Day-to-day responsibility for AP in supply chain</li> </ul>
B.1.2	Incentives and performance management	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Not met: Senior manager incentives for human rights</li> <li>Not met: At least one key AP HR risk, beyond employee H&amp;S</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Not met: Performance criteria made public</li> </ul>
B.1.3	Integration with enterprise risk management	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Not met: HR risks is integrated as part of enterprise risk system</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Not met: Audit Ctte or independent risk assessment</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.4.a	Communication /dissemination of policy commitment(s) within Company's own operations	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Commits to ILO core conventions</li> <li>• Not met: Communicates its policy to all workers in own operations</li> </ul> Score 2 <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> </ul>
B.1.4.b	Communication /dissemination of policy commitment(s) to business relationships	0	The individual elements of the assessment are met or not as follows: Score 1 <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</li> <li>• Not met: Requiring AP suppliers to communicate policy down the chain: In the Supply Chain Responsibility Code, the Company states "suppliers shall ensure that their vendors / suppliers and subcontractors adhere to the standards and practices of this Code". The company states in the Business Responsibility Report that "Relevant information is communicated/available to concerned stakeholders in a transparent manner". However, it does not mention how the Company communicates its human rights policy to its own suppliers. [Supply Chain Standard and Responsibility Code, 29 Mar 2019: <a href="https://static01.jockeyindia.com">static01.jockeyindia.com</a> &amp; Business Responsibility Report, 01 Oct 2018: <a href="https://static01.jockeyindia.com">static01.jockeyindia.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: How HR commitments made binding/contractual</li> <li>• Not met: Including on AP suppliers</li> </ul>
B.1.5	Training on Human Rights	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• 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> Score 2 <ul style="list-style-type: none"> <li>• Not met: Score of 2 on A.1.2</li> <li>• Not met: Both requirements under score 1 met</li> </ul>
B.1.6	Monitoring and corrective actions	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Met: Scores at least 1 on A.1.2</li> <li>• Not met: Monitoring implementation of HR policy commitments: The Company's Corporate Social Responsibility (CSR) Committee ensures transparent monitoring mechanism for CSR activities. However; the CSR does not apply for human rights. [Corporate Social Responsibility Policy, 2017: <a a="" base="" cedocuments="" corporatesocialresponsibilitypolicy-july2017.pdf#\10.10.10.52\dropbox\financas="" dados\empresas\planilha_pageindustries.xlsx#'sources="" de="" e="" foundation\05.="" href="https://static01.jockeyindia.com//cedocuments/CorporateSocialResponsibilityPolicy-July2017.pdf#\10.10.10.52\Dropbox\Financas Sustentaveis\EIRIS Foundation\05. Planilha e base de dados\Empresas\Planilha_PageIndustries.xlsx#'Sources summary'!B]&lt;/a&gt;&lt;/li&gt; &lt;/ul&gt; &lt;ul&gt; &lt;li&gt;• Met: Monitoring AP suppliers: According to the Supply Chain Responsibility Code, the Company requires Suppliers to take corrective actions for deviations from the Code, periodically conducts unannounced and/or announced on-site audits of Suppliers and is also entitled to track Suppliers' remediation efforts. The Company may terminate its relationship with any Supplier for alleged violation of the Code. [Corporate Social Responsibility Policy, 2017: &lt;a href=" https:="" planilha="" static01.jockeyindia.com="" summary'!b]<="" sustentaveis\eiris=""></a></li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Met: Score of 2 on A.1.2</li> <li>• Not met: Describes corrective action process: According to the Vigil Mechanism " If an investigation leads the Vigilance and Ethics Officer / MD / Chairman of the Audit Committee to conclude that an improper or unethical act has been committed, the Vigilance and Ethics Officer / MD / Chairman of the Audit Committee shall recommend to the management of the Company to take such disciplinary or corrective action as he may deem fit." However; the Company does not describes how it monitors its implementation of its human rights policy commitments.. [Vigil Mechanism, 2017: <a href="https://static01.jockeyindia.com">static01.jockeyindia.com</a>]</li> <li>• Not met: Example of corrective action</li> <li>• Not met: Discloses % of AP supply chain monitored</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.7	Engaging business relationships	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Met: HR affects AP selection of suppliers: According to the Supply Chain Responsibility, Page Industries states that it requires its Suppliers to comply with the Supplier Code. Moreover, the Company evaluates prospective Suppliers rigorously against a set of business requirements before it embarks upon any relationship, including quality, service, assurance of supply, reputation, cost, innovation, capability and sustainability. [Supply Chain Standard and Responsibility Code, 29 Mar 2019: <a href="http://static01.jockeyindia.com">static01.jockeyindia.com</a>]</li> <li>• Not met: HR affects on-going AP supplier relationships</li> </ul> Score 2 <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	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Stakeholder process or systems: Page Industries' Business Responsibility Report states that "Businesses should systematically identify their stakeholders, understand their concerns, define purpose and scope of engagement, and commit to engaging with them." However, the document does not describe how the Company has identified and engaged with potentially and affected stakeholders.</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> Score 2

## 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): According to the Business Responsibility Report, "Businesses should integrate respect for human rights in management systems, in particular through assessing and managing human rights impacts of operations, and ensuring all individuals impacted by the business have access to grievance mechanisms." However; the Company does not describe the process for assessing it human rights risks and what it considers to be its salient human rights issues. [Business Responsibility Report, 01 Oct 2018: <a href="http://static01.jockeyindia.com">static01.jockeyindia.com</a>]</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	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: The Company states in its CSR Report that " The CSR Committee shall ensure transparent monitoring mechanism for CSR activities. i. The CSR Committee shall review the progress of CSR activities at least twice a year, including the annual review ii. The Board of Directors shall review the progress of CSR activities at least annually Further, a specific monitoring and evaluation plan shall be developed as part of annual implementation plan</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
	risks and impacts		<p>clearly explaining the focus and periodicity of monitoring. IL may conduct periodical evaluation of activities by a competent external agency to understand the program efficiency and outcomes". However, it is not clear whether the Company has a system to specifically review how effective actions to tackle specific human rights salient issues have been. [Corporate Social Responsibility Policy, 2017: <a href="https://static01.jockeyindia.com//cedocuments/CorporateSocialResponsibilityPolicy-July2017.pdf#\10.10.10.52\Dropbox\Financas Sustentaveis\EIRIS Foundation\05. Planilha e base de dados\Empresas\Planilha_PageIndustries.xlsx#Sources summary!B">https://static01.jockeyindia.com//cedocuments/CorporateSocialResponsibilityPolicy-July2017.pdf#\10.10.10.52\Dropbox\Financas Sustentaveis\EIRIS Foundation\05. Planilha e base de dados\Empresas\Planilha_PageIndustries.xlsx#Sources summary!B</a>]</p> <ul style="list-style-type: none"> <li>• Not met: Lessons learnt from checking effectiveness</li> </ul> <p>Score 2</p> <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	<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: 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> <p>Score 2</p> <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	<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: Channel accessible to all workers: The Company states that it has created "Grievance Redressal mechanism (grievance box) at all manufacturing units and locations for non-staff members, wherein employees can drop their genuine grievances. A committee has been constituted under a senior-level manager to review and address grievances regularly. The same is being reviewed by Head HR - Manufacturing on a monthly basis. Further, issues related to staff members are handled by VP-HR in consultation with CEO and other senior management team members". [Business Responsibility Report, 01 Oct 2018: <a href="static01.jockeyindia.com">static01.jockeyindia.com</a>]</li> </ul> <p>Score 2</p> <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: Expect AP supplier to have equivalent grievance systems: According to its Supply Chain Code, 'suppliers shall create a mechanism for workers to submit their grievances anonymously, and shall ensure smooth functioning of such mechanism. The code states that suppliers shall ensure that their vendors/suppliers and subcontractors adhere to the standards and practices of this code'. [Supply Chain Standard and Responsibility Code, 29 Mar 2019: <a href="static01.jockeyindia.com">static01.jockeyindia.com</a>]</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	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: Response timescales [Business Responsibility Report, 01 Oct 2018: <a href="static01.jockeyindia.com">static01.jockeyindia.com</a>]</li> <li>• Not met: How complainants will be informed [Business Responsibility Report, 01 Oct 2018: <a href="static01.jockeyindia.com">static01.jockeyindia.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
	available and explained		Score 2 <ul style="list-style-type: none"> <li>Met: Escalation to senior/independent level: According to the Business Responsibility Report, the Company's "employees can approach their Welfare Officer for work related grievance. Welfare Officer discusses the issues with concerned officials and resolve it on an ongoing basis. Unresolved issues are escalated to Unit HR Manager. S/he resolves it by discussing it with all concerned. Still unresolved issues may be escalated to VP-HR. He resolves it or closes it appropriately with suitable response." [Business Responsibility Report, 01 Oct 2018: <a href="http://static01.jockeyindia.com">static01.jockeyindia.com</a>]</li> </ul>
C.5	Commitment to non-retaliation over complaints or concerns made	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Not met: Public statement prohibiting retaliation</li> <li>Not met: Practical measures to prevent retaliation</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Not met: Has not retaliated in practice</li> <li>Not met: Expects AP suppliers to prohibit retaliation</li> </ul>
C.6	Company involvement with State-based judicial and non-judicial grievance mechanisms	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Not met: Won't impede state based mechanisms</li> <li>Not met: Complainants not asked to waive rights</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Not met: Will work with state based or non judicial mechanisms</li> <li>Not met: Example of issue resolved (if applicable)</li> </ul>
C.7	Remedying adverse impacts and incorporating lessons learned	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Not met: Describes how remedy has been provided</li> <li>Not met: Says how it would remedy key sector risks</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Not met: Changes introduced to stop repetition</li> <li>Not met: Approach to learning from incident to prevent future impacts</li> <li>Not met: Evaluation of the channel/mechanism</li> </ul>

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.2.1.a	Living wage (in own production or manufacturing operations)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Not met: Living wage target timeframe</li> <li>Not met: Describes how living wage determined</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Not met: Achieved payment of living wage</li> <li>Not met: Regularly review definition of living wage with unions</li> </ul>
D.2.1.b	Living wage (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Not met: Living wage in supplier code or contracts: The Company states that "Supplier shall not make any illegal deductions and/or withhold / set-off part or full wages, which is part of the minimum wage in the form of any welfare schemes", but does not mention living wage. [Supply Chain Standard and Responsibility Code, 29 Mar 2019: <a href="http://static01.jockeyindia.com">static01.jockeyindia.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Not met: Improving living wage practices of suppliers</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Not met: Both requirements under score 1 met</li> <li>Not met: Provide analysis of trends demonstrating progress</li> </ul>
D.2.2	Aligning purchasing decisions with human rights	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Not met: Avoids business model pressure on HRs</li> <li>Not met: Positive incentives to respect human rights</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Not met: Both requirements under score 1 met</li> </ul>
D.2.3	Mapping and disclosing the supply chain	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Not met: Identifies suppliers back to product source</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Not met: Discloses significant parts of supply chain and why</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.2.4.a	Prohibition on child labour: Age verification and corrective actions (in own production or manufacturing operations)	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Met: Does not use child labour: The Company states that "As per its employment policy, PIL is committed to comply with all statutory regulations including those against child labour". [Corporate Social Responsibility Policy, 2017: <a href="https://static01.jockeyindia.com//cedocuments/CorporateSocialResponsibilityPolicy-July2017.pdf#\10.10.10.52\Dropbox\Financas Sustentaveis\EIRIS Foundation\05. Planilha e base de dados\Empresas\Planilha_PageIndustries.xlsx#Sources summary'!B">https://static01.jockeyindia.com//cedocuments/CorporateSocialResponsibilityPolicy-July2017.pdf#\10.10.10.52\Dropbox\Financas Sustentaveis\EIRIS Foundation\05. Planilha e base de dados\Empresas\Planilha_PageIndustries.xlsx#Sources summary'!B</a>]</li> <li>Not met: Age verification of job applicants and workers</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Not met: Remediation if children identified</li> </ul>
D.2.4.b	Prohibition on child labour: Age verification and corrective actions (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Not met: Child Labour rules in codes or contracts: Page Industries strictly prohibits engagement of child labor. Its suppliers must employ workers whose age is in line with minimum age for employment in the country of manufacture and shall ensure full compliance of prevention of child labor, not only for the direct labor but also their contract labor. No evidence found, however, of age verification guidelines and remediation programmes in case of child labour found. [Supply Chain Standard and Responsibility Code, 29 Mar 2019: <a href="static01.jockeyindia.com">static01.jockeyindia.com</a>]</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 demonstrating progress</li> </ul>
D.2.5.a	Prohibition on forced labour: Debt bondage and other unacceptable financial costs (in own production or manufacturing operations)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Not met: Pays workers in full and on time</li> <li>Not met: Payslips show any legitimate deductions</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Not met: How these practices are implemented and monitored for agencies, labour brokers or recruiters</li> </ul>
D.2.5.b	Prohibition on 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 Company describes how it works with suppliers to eliminate imposing any financial burdens, stating that "supplier shall not make any illegal deductions and/or withhold part or full wages, which is part of the minimum wage in the form of any welfare schemes. Supplier shall ensure that no deductions are made from wages as a disciplinary measure, nor are any other deductions made without the express written permission of the worker concerned, unless required by law."</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.c	Prohibition on forced labour: Restrictions on workers (in own production or manufacturing operations)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Not met: Does not retain documents or restrict movement</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Not met: How sure about agencies or brokers</li> </ul>



Indicator Code	Indicator name	Score (out of 2)	Explanation
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: According to the Company's Supply Chain Standards Code, "Employment must be voluntary and workers must be free to leave work and terminate their employment upon reasonable notice. Supplier should not use forced labor - indentured, bonded, or otherwise. Supplier should not ask workers to surrender government issued identifications, passports, or work permits as a condition of employment. Supplier must ensure that any worker / manpower staffing or recruiting agencies engaged by the Supplier complies with this Code, the applicable laws of the Supplier's country and the worker's home country, in its protection of the workers." [Supply Chain Standard and Responsibility Code, 29 Mar 2019: <a href="https://static01.jockeyindia.com">static01.jockeyindia.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.a	Freedom of association and collective bargaining (in own production or manufacturing operations)	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 not to interfere with union rights and collective bargaining and prohibits intimidation and retaliation: The Company respects the right to freedom of association and collective bargaining. In addition, it states that "PIL does not interfere in employees' decision to associate, try to influence their decision in any way, or discriminate against those employees who choose to associate. PIL has established Works Committee as per statutory requirement, in order to improve relations between employees and the employer; to provide an open working atmosphere for employees to express their grievance without inhibition". [Corporate Social Responsibility Policy, 2017: <a "supplier="" 2019:="" 29="" <a="" [supply="" against="" all="" and="" any="" associate".="" associate,="" association="" bargain="" chain="" choice="" choose="" code,="" collectively="" decision="" decisions="" defends="" discriminate="" employees="" employees'="" ensure="" for="" form="" have="" href="https://static01.jockeyindia.com" in="" influence="" interests".="" interfere="" its="" join="" mar="" not="" occupational="" of="" or="" own="" promotion="" responsibility="" right="" shall="" standard="" supplier="" that="" the="" their="" those="" to="" try="" way;="" who="">static01.jockeyindia.com</a>]</li> <li>• Not met: How working with suppliers on FoA and CB</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.2.7.a	Health and safety: Fatalities, lost days, injury rates (in own production of manufacturing 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: Injury Rate disclosures</li> <li>• Not met: Lost days or near miss disclosure</li> <li>• Not met: Fatalities disclosures</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Set targets for H&amp;S performance</li> <li>• Not met: Met targets or explains why not</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 Supply Chain code claims that "Supplier must recognize that workers deserve a safe and healthy work environment, and supplier shall, at a minimum, comply with applicable laws regarding working conditions and with the standards in this Code." It also has specific requirements regarding machine safeguarding, dormitories, occupational safety, and emergency preparedness &amp; response [Supply Chain Standard and Responsibility Code, 29 Mar 2019: <a href="https://static01.jockeyindia.com">static01.jockeyindia.com</a>]</li> <li>• Not met: Injury rate disclosures</li> <li>• Not met: Lost days or near miss disclosures</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <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.a	Women's rights (in own production or manufacturing operations)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Not met: Process to stop harassment and violence</li> <li>Not met: Working conditions take account of gender</li> <li>Not met: Equality of opportunity at all levels</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Not met: Meets all of the requirements under score 1</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.a	Working hours (in own production or manufacturing operations)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Not met: Respects max hours, min breaks and rest periods in its own operations</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Not met: How it implements and checks this</li> </ul>
D.2.9.b	Working hours (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Not met: Working hours in codes or contracts: According to the Supply Code, the Company's suppliers shall ensure that working hours do not exceed the maximum permitted by law. The overtime if any, shall be voluntary for the workers to accept and Supplier should not take actions which are detrimental to the employee if he/she chooses to refuse overtime work. No evidence found, however, in relation minimum breaks and rest periods. [Supply Chain Standard and Responsibility Code, 29 Mar 2019: <a href="http://static01.jockeyindia.com">static01.jockeyindia.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Not met: How working with suppliers on working hours</li> <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 6.81 out of 80 points scored in themes A-D & F has been applied to produce a score of 1.70 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 out of 4	Out of a total of 48 indicators assessed under sections A-D of the benchmark, Page Industries made data public that met one or more elements of the methodology in 12 cases, leading to a disclosure score of 1 out of 4 points.
F.2	Recognised Reporting Initiatives	0 out of 2	The individual elements of the assessment are met or not as follows: Score 2 <ul style="list-style-type: none"> <li>Not met: Company reports on GRI</li> <li>Not met: Company reports on SASB</li> <li>Not met: Company reports on UNGPRF</li> </ul>
F.3	Key, High Quality Disclosures	0 out of 4	Page Industries met 0 of the 10 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> <li>• Not met: Score 1 for D.2.1.a : Living wage (in own production or manufacturing operations)</li> <li>• Not met: Score 2 for D.2.7.a : Health and safety: Fatalities, lost days, injury rates (in own production of manufacturing operations)</li> </ul>

## Disclaimer

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

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

The Benchmark is made available on the express understanding that it will be used solely for general information purposes. The material contained in the Benchmark should not be construed as relating to accounting, legal, regulatory, tax, research or investment advice and it is not intended to take into account any specific or general investment objectives. The material contained in the Benchmark does not constitute a recommendation to take any action or to buy or sell or otherwise deal with anything or anyone identified or contemplated in the Benchmark. Before acting on anything contained in this material, you should consider whether it is suitable to your particular circumstances and, if necessary, seek professional advice. The material in the Benchmark has been put together solely according to the CHRB methodology and not any other assessment models in operation within any of the project partners or EIRIS Foundation as provider of the analyst team.

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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.