

**Company Name** Prada  
**Industry** Apparel (Supply Chain and Own Operations)  
**Overall Score (\*)** 12.2 out of 100

Theme Score	Out of	For Theme
2.1	10	A. Governance and Policies
0.5	25	B. Embedding Respect and Human Rights Due Diligence
1.3	15	C. Remedies and Grievance Mechanisms
3.1	20	D. Performance: Company Human Rights Practices
2.4	20	E. Performance: Responses to Serious Allegations
2.8	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	2	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Met: General HRs commitment: In its Sustainability Policy the Company states 'the Prada Group is committed to operating with full respect for the value of the individual and for the human and workers' rights enshrined in Italian and international covenants and declarations, such as the United Nations Universal Declaration of Human Rights, the International Labor Organization (ILO) Declaration on Fundamental Principles and Rights at Work, and the Organization for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises'. [Sustainability Policy, 15.03.2019: <a href="http://pradagroup.com">pradagroup.com</a>]</li> <li>Met: UDHR: See above [Sustainability Policy, 15.03.2019: <a href="http://pradagroup.com">pradagroup.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Met: OECD: As indicated above the Company is committed to operate in full respect with a number of initiatives including the OECD Guidelines for MNEs. [Sustainability Policy, 15.03.2019: <a href="http://pradagroup.com">pradagroup.com</a>]</li> </ul>
A.1.2	Commitment to respect the human rights of workers	1.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Met: ILO Core: In its Sustainability Policy the Company states 'Moreover, the Prada Group is committed to operating with full respect for the value of the individual and for the human and workers' rights enshrined in Italian and international covenants and declarations, such as [...] the International Labor Organization (ILO) Declaration on Fundamental Principles and Rights at Work'. [Sustainability Policy, 15.03.2019: <a href="http://pradagroup.com">pradagroup.com</a> &amp; Code of Ethics: <a href="http://pradagroup.com">pradagroup.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Met: Explicitly list ALL four ILO for AP suppliers: The Company states in its Sustainability Policy that 'the Prada Group is committed to operating with full respect for the value of the individual and for the human and workers' rights enshrined in Italian and international covenants and declarations, such as [...] the International Labor Organization (ILO) Declaration on Fundamental Principles and Rights at Work' and that it 'considers unacceptable any form of forced labor or child labor and any type of employment or professional discrimination' and that it 'recognizes the right to collective bargaining and to exercise freedom of association both internally and within its sphere of influence throughout the entire value chain.' [Code of Ethics: <a href="http://pradagroup.com">pradagroup.com</a> &amp; Sustainability Policy, 15.03.2019: <a href="http://pradagroup.com">pradagroup.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Explicit commitment to All four ILO Core: In its Sustainability Policy the Company states that it 'considers unacceptable any form of forced labor or child labor and any type of employment or professional discrimination. It recognizes the right to collective bargaining and to exercise freedom of association both internally and within its sphere of influence throughout the entire value chain.' [Sustainability Policy, 15.03.2019: <a href="http://pradagroup.com">pradagroup.com</a> &amp; Code of Ethics: <a href="http://pradagroup.com">pradagroup.com</a>]</li> <li>• Met: Respect H&amp;S of workers: The code of ethics indicates that "Prada spa and the companies of the Group exert themselves to embed a culture of health and safety for workers in the workplace, fostering risk awareness and stimulating individual responsibility". And in the Annual Report 2017 the Company states that "internal policies safeguard the health and safety of employees at all Company locations according to the highest standards and in full compliance with local and international regulations." [Annual Report 2017, 2017: <a href="http://pradagroup.com">pradagroup.com</a> &amp; Code of Ethics: <a href="http://pradagroup.com">pradagroup.com</a>]</li> <li>• Met: H&amp;S applies to AP suppliers: According to the Social Responsibility Report 2016: "The Code of Ethics sets minimum standards for suppliers" regarding H&amp;S, and the Code of Ethics states that "Prada spa and the companies of the Group exert themselves to embed a culture of health and safety for workers in the workplace, fostering risk awareness and stimulating individual responsibility". Finally its Annual Report indicates that "the signing of the Code of Ethics is a fundamental prerequisite for working with Prada." [Code of Ethics: <a href="http://pradagroup.com">pradagroup.com</a> &amp; Social responsibility report 2017, May 2018: <a href="http://pradagroup.com">pradagroup.com</a>]</li> <li>• Not met: working hours for workers</li> <li>• Not met: Working hours for AP suppliers</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	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: Although the Company states in its Sustainability Policy that 'The Group's cooperation with stakeholders such as trade Unions and tax authorities, and with partners outside its specific scope of business such as universities and large International institutions, is considered key to the establishment of common values based on a balance between business objectives and societal demands.' there is no clear evidence how this relates to affected stakeholders, such as workers' families, local communities and any other person or group of people whose life and environment might be impacted. No further evidence found in the Code of Ethics 2019 either. [Sustainability Policy, 15.03.2019: <a href="http://pradagroup.com">pradagroup.com</a> &amp; Code of Ethics 2019, 2019: <a href="http://pradagroup.com">pradagroup.com</a>]</li> <li>• Not met: Regular stakeholder engagement: No evidence found</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Commits to engage stakeholders in design: No evidence found</li> <li>• Not met: Regular stakeholder design engagement: No evidence found.</li> </ul>
A.1.5	Commitment to remedy	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Commits to remedy</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			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	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Met: CEO or Board approves policy: The Sustainability Policy, which refers to respecting Human Rights, states 'The publication of this sustainability policy is an important formal occasion for keeping the Group's ethical values alive and functioning well and reaffirming the Directors' commitment to the wider responsibility that contemporary businesses are called upon to assume. (...) Prada spa's Board of Directors oversees the setting of the Group's Sustainability Policy guidelines and their continuous updating, consistently with the evolving context in which the Group operates.' [Sustainability Policy, 15.03.2019: <a href="http://pradagroup.com">pradagroup.com</a>]</li> <li>• Not met: Board level responsibility for HRs: No specific evidence found beyond the indicated above. [Sustainability Policy, 15.03.2019: <a href="http://pradagroup.com">pradagroup.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Speeches/letters by Board members or CEO</li> </ul>
A.2.2	Board discussions	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Board/Committee review of salient HRs: The Company states in its Annual Report 2018 and in its Sustainability Policy 2019 that the Board of Directors oversees the setting of the Group's Sustainability Policy guidelines and 'the Company is committed to maintaining a high standard of corporate governance practices as part of its commitment to effective corporate governance'. Also states that 'the Board has reviewed the Company's corporate governance practices and is satisfied that such practices have complied with the code provisions set out in the Code' (Corporate Governance Code) no clear evidence found of a process the Company has in place to discuss and address human rights issues at Board level or how the Board or a Board committee regularly reviews the Company's salient human rights. [Annual Report 2018, 15.03.2019: <a href="http://pradagroup.com">pradagroup.com</a> &amp; Sustainability Policy, 15.03.2019: <a href="http://pradagroup.com">pradagroup.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Examples or trends re HR discussion</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>• Met: Commits to ILO core conventions: See A.1.2 [Sustainability Policy, 15.03.2019: <a href="http://pradagroup.com">pradagroup.com</a>]</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>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			Score 2 • Not met: Performance criteria made public
B.1.3	Integration with enterprise risk management	1	The individual elements of the assessment are met or not as follows: Score 1 • Met: HR risks is integrated as part of enterprise risk system: In the 2018 Social responsibility report the Company explains its risk management strategies and states on page 20 'For the Prada Group, risks can be broken down as follows: [...]risks specific to the Prada Group relating to the importance of key personnel, strategy implementation, outsourcing, legal and regulatory compliance and processing of data and information. Within this context, the risks related to sustainability are mainly associated with customer satisfaction and health and safety (chapter 4, paragraph 4.1.4) and respect of human and labor rights both within the organization and along the supply chain (chapter 3 and chapter 4, paragraph 4.1.2)' [Social responsibility report 2018, 15.03.2019: <a href="http://pradagroup.com">pradagroup.com</a> ] Score 2 • Not met: Audit Ctte or independent risk assessment: While the Company states in its 2018 Social responsibility report that 'Prada has set up an Industrial Compliance Committee to ensure that the production and distribution of its products worldwide always comply with applicable laws' and that 'with particular reference to production and logistics issues, the Industrial Compliance Committee sets guidelines for implementing laws and regulations that affect the importing and exporting of raw materials and finished goods, while providing various forms of industrial compliance assistance to the manufacturing divisions' no evidence was found on the Audit committee or an independent party assessing the adequacy of the risk management systems in managing human rights risks. [Social responsibility report 2018, 15.03.2019: <a href="http://pradagroup.com">pradagroup.com</a> ]
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 • Met: Commits to ILO core conventions: See A.1.2 [Sustainability Policy, 15.03.2019: <a href="http://pradagroup.com">pradagroup.com</a> ] • Not met: Communicates its policy to all workers in own operations: In its Sustainability Policy the Company declares its commitment to ILO core conventions. It is publicly available on the Company's website, in English, Italian, Chinese and Japanese. In its Social Responsibility report, it states that 'the Prada Group Code of Ethics is distributed to all employees and parties who work towards developing, manufacturing, promoting, distributing and selling the organization's products of the brands in the portfolio. The Group promotes knowledge of the Code through various means such as online publications, direct communications...'. However, the Code of ethics does not contain the Company's human rights policies. [Sustainability Policy, 15.03.2019: <a href="http://pradagroup.com">pradagroup.com</a> & Social responsibility report 2018, 15.03.2019: <a href="http://pradagroup.com">pradagroup.com</a> ] Score 2 • Met: Commits to all 4 ILO core conventions: See A.1.2 [Sustainability Policy, 15.03.2019: <a href="http://pradagroup.com">pradagroup.com</a> ] • Not met: Communication of policy commitments to stakeholder: In its Sustainability Policy the Company states 'The Prada Group regularly discloses information on its sustainability activities to its stakeholders in its Social Responsibility Report published on the website' However, there is no reference to how it actively communicates its human rights policies to local communities and potentially affected stakeholders. [Code of Ethics 2019, 2019: <a href="http://pradagroup.com">pradagroup.com</a> & Sustainability Policy, 15.03.2019: <a href="http://pradagroup.com">pradagroup.com</a> ] • Not met: How policy commitments are made accessible to audience [Code of Ethics 2019, 2019: <a href="http://pradagroup.com">pradagroup.com</a> & Social responsibility report 2018, 15.03.2019: <a href="http://pradagroup.com">pradagroup.com</a> ]
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 • Met: Commits to all 4 ILO core conventions for suppliers: See A.1.2 [Sustainability Policy, 15.03.2019: <a href="http://pradagroup.com">pradagroup.com</a> ] • Not met: Communicating policy down the whole AP supply chain: The Company indicates in its 2018 report that the 'Code of Ethics is distributed to all employees and parties who work toward developing, manufacturing, promoting, distributing and selling the Organization's products of the brands in the portfolio. The Group promotes knowledge of the Code through various means such as online publications, direct communications and, by procedure, as part of the supply contract with most of the partners, as it is considered a prerequisite for the establishment of all contractual relationships.' It also states in the same document that "the signing of the Code of Ethics is a fundamental prerequisite for working with Prada". However, no clear evidence found of communication activities down

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>the supply chain (or requiring its suppliers to do so), including human rights policies (the Code of ethics does not seem to include those policies). [Code of Ethics 2019, 2019: <a href="http://pradagroup.com">pradagroup.com</a> &amp; Social responsibility report 2018, 15.03.2019: <a href="http://pradagroup.com">pradagroup.com</a>]</p> <ul style="list-style-type: none"> <li>• Not met: Requiring AP suppliers to communicate policy down the chain</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: How HR commitments made binding/contractual: In its Social Responsibility Report 2018 the Company states that 'the signing of the Code of Ethics is a fundamental prerequisite for working with Prada'. However, the code of ethics does not contain a formal commitment to All ILO core labour standards. [Social responsibility report 2018, 15.03.2019: <a href="http://pradagroup.com">pradagroup.com</a>]</li> <li>• Not met: Including on AP suppliers: See above [Code of Ethics 2019, 2019: <a href="http://pradagroup.com">pradagroup.com</a> &amp; Annual Report 2018, 15.03.2019: <a href="http://pradagroup.com">pradagroup.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>• Met: Scores at least 1 on A.1.2: See A.1.2 [Sustainability Policy, 15.03.2019: <a href="http://pradagroup.com">pradagroup.com</a>]</li> <li>• Not met: Trains all workers on HR policy commitments: In a press release from February 13, 2019 the Company announces that it has created the Diversity and Inclusion Advisory Council with different training programs and scholarships for students being mentioned. However, no evidence found for training of all workers on the Company's human rights policy commitment(s). [Prada announces the Diversity and Inclusion Advisory Council, 13.02.2019: <a href="http://pradagroup.com">pradagroup.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Trains relevant AP managers including procurement</li> <li>• Not met: Score of 2 on A.1.2</li> <li>• Not met: Both requirements under score 1 met</li> </ul>
B.1.6	Monitoring and corrective actions	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Scores at least 1 on A.1.2: See A.1.2 [Sustainability Policy, 15.03.2019: <a href="http://pradagroup.com">pradagroup.com</a>]</li> <li>• Not met: Monitoring implementation of HR policy commitments: No evidence found of the Company monitoring compliance with human and labour rights in own operations and supply chain. It indicates in its Modern Slavery Statement that 'the Prada Group believes that the risk of modern slavery within its organization is essentially non-existent, while it deemed that same risk as overall low along its external industrial supply chain'. [Statement on Modern Slavery 2018, 16.05.2019: <a href="http://pradagroup.com">pradagroup.com</a>]</li> <li>• Not met: Monitoring AP suppliers: In its Statement on Modern Slavery 2018 the Company states 'This type of control is coupled with visits by industrial divisions to suppliers (almost daily for the most important ones) which, apart from ensuring compliance with technical and commercial agreements, provide additional confirmation regarding working conditions. In case of a non-compliance that can be remedied, the supplier may be temporarily suspended until the corrective actions are implemented, while for cases that are more serious the contract may be terminated immediately.' However, it is not clear whether human and labour rights issues are widely monitored, as topics include 'compliance with the law on remuneration, social security, taxation, health and safety, the environment, privacy and the governance model. As mentioned, the signing of the Code of Ethics is a fundamental prerequisite for working with Prada. However, it is not clear whether audits coverage go beyond the topics mentioned and the code of ethics, which does not seem to contain human rights policies. [Statement on Modern Slavery 2018, 16.05.2019: <a href="http://pradagroup.com">pradagroup.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Score of 2 on A.1.2</li> <li>• Not met: Describes corrective action process</li> <li>• Not met: Example of corrective action</li> <li>• Not met: Discloses % of AP supply chain monitored</li> </ul>
B.1.7	Engaging business relationships	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 affects AP selection of suppliers: In its Annual Report 2018 the Company states that in order to achieve the highest quality standards, the Group 'undergoes a strict process in selecting and maintaining its suppliers with the aim of establishing long-term relationships.' It adds: 'specifically for ethical issues, the accreditation and maintenance of a supplier's qualification are based on the collection of documents, attestations, and self-certifications that ensure compliance with the law on remuneration, social security, taxation, health and safety, the environment, privacy and governance model!'. No evidence found of</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>human and labour rights being considered in the selection process (beyond health and safety). [Annual Report 2018, 15.03.2019: <a href="http://pradagroup.com">pradagroup.com</a> &amp; Social responsibility report 2018, 15.03.2019: <a href="http://pradagroup.com">pradagroup.com</a>]</p> <ul style="list-style-type: none"> <li>• Not met: HR affects on-going AP supplier relationships: In its Annual Report 2018 on page 70 the Company states that it has 'implemented a strict inspection and quality control process for all outsourced production' and that the Group 'demands compliance with applicable regulations concerning labor, social security, and occupational health and safety. The Group also requires its contract manufacturers to read the Prada Group Code of Ethics and comply with the principles set forth therein. Risk of contractual non-compliance is mitigated by a control system based on procedures that define internal responsibilities for the assessment of the suppliers' ethical, technical and financial soundness.' However, the code of ethics does not contain a the Company's human rights commitments. [Annual Report 2018, 15.03.2019: <a href="http://pradagroup.com">pradagroup.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both requirement under score 1 met</li> <li>• Not met: Working with AP suppliers to improve performance</li> </ul>
B.1.8	Approach to engagement with potentially affected stakeholders	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Stakeholder process or systems: In its Social Responsibility Report 2017 the Company describe its actions to map its stakeholders. However on its definition of stakeholder it speaks only about "all of which can directly or indirectly influence or be influenced by the achievement of business objectives". No evidence found of engaging affected or potentially affected stakeholders and how it identifies them. [Social responsibility report 2017, May 2018: <a href="http://pradagroup.com">pradagroup.com</a>]</li> <li>• Not met: Frequency and triggers for engagement</li> <li>• Not met: Workers in AP SC engaged</li> <li>• Not met: Communities in the AP SC engaged</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Analysis of stakeholder views and company's actions on them: The Company communicates in its Social Responsibility Report 2016 some results of the analysis of stakeholders concerns: "aspects associated with the production process and its impact throughout the supply chain are the most important for stakeholders (product responsibility, human rights and employee well-being along the supply chain, occupational health and safety, raw materials sourcing, traceability and responsible supply chain management)." However there is no information about how the Company took those views into account. [Social responsibility report 2016, 2016: <a href="http://pradagroup.com">pradagroup.com</a>]</li> </ul>

## B.2 Human Rights Due Diligence (15% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.1	Identifying: Processes and triggers for identifying human rights risks and impacts	0	<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: Identifying risks in own operations: In its Annual Report 2018 the Company states that the Group 'complies with the applicable international and national laws and regulations for working hours, minimum guaranteed breaks and rest periods' and that it has established a supervisory body 'whose primary duty is to ensure the functioning, effectiveness and enforcement of the Company's Model of Organization'. In the public disclosure to CHRB it also states that 'Under this control model, specific procedures have been implemented to identify crimes, including law breaches in terms of human and workers' rights.' However, no evidence found on the specific steps taken, or those existing procedures, to identify which are the potential human rights issues it may face. [Annual Report 2018, 15.03.2019: <a href="http://pradagroup.com">pradagroup.com</a> &amp; Social responsibility report 2018, 15.03.2019: <a href="http://pradagroup.com">pradagroup.com</a>]</li> <li>• Not met: Identifying risks in AP suppliers</li> </ul> <p>Score 2</p> <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)	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: Salient risk assessment (and context)</li> <li>• Not met: Public disclosure of salient risks</li> </ul> <p>Score 2</p> <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
	and key industry risks)		
B.2.3	Integrating and Acting: Integrating assessment findings internally and taking appropriate action	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Action Plans to mitigate risks</li> <li>• Not met: Including in AP supply chain</li> <li>• Not met: Example of Actions decided</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> </ul>
B.2.4	Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: System to check if Actions are effective</li> <li>• Not met: Lessons learnt from checking effectiveness</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Both requirement under score 1 met</li> </ul>
B.2.5	Communicating : Accounting for how human rights impacts are addressed	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Comms plan re identifying risks</li> <li>• Not met: Comms plan re assessing risks</li> <li>• Not met: Comms plan re action plans for risks</li> <li>• Not met: Comms plan re reviewing action plans</li> <li>• Not met: Including AP suppliers</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Responding to affected stakeholders concerns</li> <li>• Not met: Ensuring affected stakeholders can access communications</li> </ul>

### C. Remedies and Grievance Mechanisms (15% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.1	Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers	1.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Met: Channel accessible to all workers: The Company states in its 2018 Social Responsibility Report that 'All the employees can communicate anonymously to the Supervisory Body through an e-mail address available on the Company's Intranet. In 2018 there were no communications of behavior that could constitute a violation of the Organizational Model, for instance in contrast with the principles set out in the Code of Ethics or with applicable laws and regulations.' [Social responsibility report 2018, 15.03.2019: <a href="http://pradagroup.com">pradagroup.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Met: Number grievances filed, addressed or resolved: The Company states in its 2018 Social Responsibility Report 'All the employees can communicate anonymously to the Supervisory Body through an e-mail address available on the Company's Intranet. In 2018 there were no communications of behavior that could constitute a violation of the Organizational Model, for instance in contrast with the principles set out in the Code of Ethics or with applicable laws and regulations.' [Social responsibility report 2018, 15.03.2019: <a href="http://pradagroup.com">pradagroup.com</a>]</li> <li>• Not met: Channel is available in all appropriate languages: No evidence found</li> <li>• Not met: Expect AP supplier to have equivalent grievance systems</li> <li>• Not met: Opens own system to AP supplier workers</li> </ul>
C.2	Grievance channel(s)/mechanism(s) to receive complaints or concerns from external individuals and communities	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Grievance mechanism for community</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Describes accessibility and local languages</li> <li>• Not met: Expects AP supplier to have community grievance systems</li> <li>• Not met: AP supplier communities use global system</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.3	Users are involved in the design and performance of the channel(s)/mechanism(s)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Engages users to create or assess system</li> <li>• Not met: Description of how they do this</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Engages with users on system performance</li> <li>• Not met: Provides user engagement example on performance</li> <li>• Not met: AP suppliers consult users in creation or assessment</li> </ul>
C.4	Procedures related to the mechanism(s)/channel(s) are publicly available and explained	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Response timescales</li> <li>• Not met: How complainants will be informed</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Escalation to senior/independent level</li> </ul>
C.5	Commitment to non-retaliation over complaints or concerns made	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Public statement prohibiting retaliation</li> <li>• Not met: Practical measures to prevent retaliation</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Has not retaliated in practice</li> <li>• Not met: Expects AP suppliers to prohibit retaliation</li> </ul>
C.6	Company involvement with State-based judicial and non-judicial grievance mechanisms	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Won't impede state based mechanisms</li> <li>• Not met: Complainants not asked to waive rights</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Will work with state based or non judicial mechanisms</li> <li>• Not met: Example of issue resolved (if applicable)</li> </ul>
C.7	Remedying adverse impacts and incorporating lessons learned	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Describes how remedy has been provided</li> <li>• Not met: Says how it would remedy key sector risks</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Changes introduced to stop repetition</li> <li>• Not met: Approach to learning from incident to prevent future impacts</li> <li>• Not met: Evaluation of the channel/mechanism</li> </ul>

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.2.1.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: The Company cites from its 2018 Social Responsibility Report that 'the CCNL regulates the rights, guarantees and obligations of all workers belonging to a specific sector, in terms of pay and regulatory provisions, such as guaranteed minimum wages, working hours, holidays' and that due to 'dialogue and cooperation in place with Italian trade unions, there were no labor strikes during the year' and that the Group 'entered into specific welfare agreements with Italian unions to strengthen further its relationships with all its Italian employees'. However, no evidence was found where the Company indicates target timeframe for paying all workers a living wage. Evidence seems to refer to Italian context, where the Company has 37% of its workforce. In its disclosure to CHRB, it also indicates that 'in all countries where the Group directly operates, the level of wages recognized to employees is sensibly higher than the law requirements and close to the highest levels in the luxury industry'. However, no further details found in relation to paying all workers a living wage or having a timeframe to do so. [Social responsibility report 2018, 15.03.2019: <a href="http://pradagroup.com">pradagroup.com</a> &amp; Disclosure to CHRB Platform 2019, 21/06/2019: <a href="http://business-humanrights.org">business-humanrights.org</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Describes how living wage determined: As indicated above, the Company describes how it establishes wages in Italy.</li> <li>• Not met: Achieved payment of living wage</li> <li>• Not met: Regularly review definition of living wage with unions</li> </ul>



Indicator Code	Indicator name	Score (out of 2)	Explanation
D.2.1.b	Living wage (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Living wage in supplier code or contracts</li> <li>• Not met: Improving living wage practices of suppliers</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> <li>• Not met: Provide analysis of trends demonstrating progress</li> </ul>
D.2.2	Aligning purchasing decisions with human rights	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Avoids business model pressure on HRs</li> <li>• Not met: Positive incentives to respect human rights</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> </ul>
D.2.3	Mapping and disclosing the supply chain	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Identifies suppliers back to product source</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Discloses significant parts of supply chain and why</li> </ul>
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 in its 2019 Sustainability Policy 'Prada considers unacceptable any form of forced labor or child labor and any type of employment or professional discrimination.' [Sustainability Policy, 15.03.2019: <a href="http://pradagroup.com">pradagroup.com</a>]</li> <li>• Not met: Age verification of job applicants and workers: No evidence found</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Remediation if children identified: No evidence found</li> </ul>
D.2.4.b	Prohibition on 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: In its 2019 Sustainability Policy the Company states 'Prada considers unacceptable any form of forced labor or child labor and any type of employment or professional discrimination [...] both internally and within its sphere of influence throughout the entire value chain. [Sustainability Policy, 15.03.2019: <a href="http://pradagroup.com">pradagroup.com</a>]</li> <li>• Not met: How working with suppliers on child labour: In its 2019 Social Responsibility Report the Company states 'The Prada Group has adopted the "Group's qualified vendor list" procedure to define the responsibilities and operational behaviors required to evaluate ethical, technical and economical reliability. Additional controls needed to initiate and continue with supply relationships are set out in the procurement policy, which calls for mitigating risks of non-compliance through additional controls and accountability.' However, no clear evidence found of child labour guidelines and age verification of applicants or workers along the supply chain. The Company also indicates that 'in 2018, approximately 82% of the Group's industrial suppliers (i.e. raw materials and manufacturing suppliers) are located in Italy'- [Social responsibility report 2018, 15.03.2019: <a href="http://pradagroup.com">pradagroup.com</a> &amp; Disclosure to CHRB Platform 2019, 21/06/2019: <a href="http://business-humanrights.org">business-humanrights.org</a>]</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: The Company provides evidences including on salaries being higher than law requirements, employees in, at least Italy, being covered by collective agreements, etc. However, this indicator looks for a specific statement indicating that it pays regularly, in full and on time, and does not require workers to pay work-related fees or costs.</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>

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.2.5.b	Prohibition on forced labour: Debt bondage and other unacceptable financial costs (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Debt and fees rules in codes or contracts</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: In its Social responsibility report 2018 the Company states that 'the Group complies with the applicable international and national laws and regulations for working hours, minimum guaranteed breaks and rest periods. Thanks to the respect, dialogue and cooperation in place with Italian trade unions, there were no labor strikes during the year, just as none had occurred in 2016 or 2017.' However, no evidence found of a source that indicates that the Company does not retain the workers' personal documents or restrict their freedom of movement company-wide. [Social responsibility report 2018, 15.03.2019: <a href="http://pradagroup.com">pradagroup.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: How sure about agencies or brokers</li> </ul>
D.2.5.d	Prohibition on forced labour: Restrictions on workers (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Free movement rules in codes or contracts</li> <li>• Not met: How these practices are implemented and monitored for agencies, labour brokers or recruiters</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.a	Freedom of association and collective bargaining (in own production or manufacturing operations)	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Met: Commits not to interfere with union rights and collective bargaining and prohibits intimidation and retaliation: In its Social responsibility report the Company states that 'the Group promotes freedom of association and recognize the right to collective bargaining. In fact, the Prada Group collaborates with trade unions to improve the working conditions of its employees and to foster the medium/long-term well-being of its employees and thus its surrounding communities.' However no formal commitment found to not interfere with these rights. In relation to practical measures to prohibit retaliation, the Company has high union recognition in some countries. It is not clear, however, the total percentage of employees that are covered by collective bargaining agreements globally. [Social responsibility report 2018, 15.03.2019: <a href="http://pradagroup.com">pradagroup.com</a>]</li> <li>• Not met: Discloses % covered by collective bargaining: In its Social responsibility report the Company states that 'the Group promotes freedom of association and recognize the right to collective bargaining. [...] Over the years the Group has stipulated many supplementary agreements especially in Italy, United Kingdom and France, whereby it offers better benefits than those established in the local collective bargaining agreements. For instance, 80% of the employees in Italy and 100% in France can benefit from the supplementary agreements.' However, these numbers do not apply to the whole workforce of the Company. [Social responsibility report 2018, 15.03.2019: <a href="http://pradagroup.com">pradagroup.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Both requirement under score 1 met</li> </ul>
D.2.6.b	Freedom of association and collective bargaining (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: FoA &amp; CB rules in codes or contracts</li> <li>• Not met: How working with suppliers on FoA and CB</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>

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.2.7.a	Health and safety: Fatalities, lost days, injury rates (in own production of 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: Injury Rate disclosures: The Company discloses its injury rates for the past three years in the Social Responsibility Report 2017. However the figures are only for Italy. [Social responsibility report 2017, May 2018: <a href="http://pradagroup.com">pradagroup.com</a>]</li> <li>• Not met: Lost days or near miss disclosure: The Company discloses some injury indicators such as injury rate and gravity rate. However, it does not provide figures and or explanations on lost days/frequency rate, and the figures are only for Italy. [Social responsibility report 2017, May 2018: <a href="http://pradagroup.com">pradagroup.com</a>]</li> <li>• Not met: Fatalities disclosures: The Company indicates in the Social responsibility report 2017 that "There was one case of occupational disease in Italy in the period". However the figures are only for Italy. [Social responsibility report 2017, May 2018: <a href="http://pradagroup.com">pradagroup.com</a>]</li> </ul> Score 2 <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	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Sets out clear Health and Safety requirements</li> <li>• Not met: Injury rate disclosures</li> <li>• Not met: Lost days or near miss disclosures</li> <li>• Not met: Fatalities disclosures</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: How working with suppliers on H&amp;S</li> <li>• Not met: Provide analysis of trends in progress made</li> </ul>
D.2.8.a	Women's rights (in own production or manufacturing operations)	1	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>• Met: Equality of opportunity at all levels: The Company indicates in its Social Responsibility Report 2017 that "The strong female presence is demonstrated by the ratio between males and females for each job category: women not only represent the majority of Labor (56%) and Staff Workers (65%); they are also the largest component (55%) of Executives and Managers. Another distinctive characteristic is the prevalence of females in all divisions. Even at a geographical level females represent more than half of workers in all areas, with peaks in Japan and the Asia Pacific, where females account for 72% and 68% of employees respectively. Equal opportunity is also reflected in the compensation and benefit system, based on the enhancement of skills and on merit, which ensures consistent treatment of genders, seniority and positions. The gender pay gap with respect to men's and women's average salaries is shown below. In line with the data on the female presence by qualification, substantial equality in the remuneration treatment typical of the Prada Group is evident, with a ratio almost always equal to 100% for all types of qualification." [Social responsibility report 2017, May 2018: <a href="http://pradagroup.com">pradagroup.com</a>]</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)	2	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Met: Respects max hours, min breaks and rest periods in its own operations: The Company states in its Social responsibility report 2018 that it 'complies with the applicable international and national laws and regulations for working hours, minimum guaranteed breaks and rest periods.' [Social responsibility report 2018, 15.03.2019: <a href="http://pradagroup.com">pradagroup.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> <li>Met: How it implements and checks this: The Company states in its Social responsibility report 2018 that 'under Italian labor law, the National Collective Labor Contracts (CCNL) supplements the law and is stipulated at a national level, for commodity sectors [...] between trade unions and associations representing companies.' It states that the CCNL regulates the rights, guarantees and obligations of all workers in terms of, for example, working hours, treatment of overtime and night-time work. The CCNL is negotiated and renewed every three years. It also indicates that 'In case of extraordinary need, within the limits set by the law, the time flexibility is in any case agreed with the employee and, when applicable (like in France or in the UK), with their representatives. For example, in Italy Prada spa entered into a supplemental agreement with Unions to offer its workers the possibility to work for a limited number of Saturday in exchange of a valuable package of monetary benefits (up to 30% higher compared to ordinary hourly remuneration plus a fixed remuneration for every Saturday worked). Another agreement, with similar valuable benefits for the employees, was entered into with Unions in France to offer the possibility to work on Sunday'. [Social responsibility report 2018, 15.03.2019: <a href="http://pradagroup.com">pradagroup.com</a> &amp; Disclosure to CHRB Platform 2019, 21/06/2019: <a href="http://business-humanrights.org">business-humanrights.org</a>]</li> </ul>
D.2.9.b	Working hours (in the supply chain)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>Not met: Working hours in codes or contracts</li> <li>Not met: How working with suppliers on working hours: Although the Company indicates in the Social responsibility report 2017 that "the Code of Ethics sets minimum standards for suppliers regarding" the rights of employees, the code of ethics disclosed on the website does not explicitly contain commitments in this respect. No further details has been provided by the Company. [Social responsibility report 2017, May 2018: <a href="http://pradagroup.com">pradagroup.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>

### 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 9.73 out of 80 points scored in themes A-D & F has been applied to produce a score of 2.43 out of 20 points for theme E.

### F. Transparency (10% of Total)

Indicator Code	Indicator name	Score	Explanation
F.1	Company willingness to publish information	0.83 out of 4	Out of a total of 48 indicators assessed under sections A-D of the benchmark, Prada made data public that met one or more elements of the methodology in 10 cases, leading to a disclosure score of 0.83 out of 4 points.
F.2	Recognised Reporting Initiatives	2 out of 2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 2</p> <ul style="list-style-type: none"> <li>Met: Company reports on GRI: In its Social Responsibility Report 2018 the Company discloses a GRI content index. [Social responsibility report 2018, 15.03.2019: <a href="http://pradagroup.com">pradagroup.com</a>]</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	<p>Prada met 0 of the 10 thresholds listed below and therefore gets 0 out of 4 points for the high quality disclosure indicator.</p> <p>Specificity and use of concrete examples</p> <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> <p>Discussing challenges openly</p> <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> <p>Demonstrating a forward focus</p>

Indicator Code	Indicator name	Score	Explanation
			<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.

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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.