

Company Name Ralph Lauren
Industry Apparel (Supply Chain only)
Overall Score (*) 13.1 out of 100

| Theme Score | Out of | For Theme |
|-------------|--------|---|
| 1.3 | 10 | A. Governance and Policies |
| 1.1 | 25 | B. Embedding Respect and Human Rights Due Diligence |
| 1.7 | 15 | C. Remedies and Grievance Mechanisms |
| 3.3 | 20 | D. Performance: Company Human Rights Practices |
| 2.6 | 20 | E. Performance: Responses to Serious Allegations |
| 3.1 | 10 | F. Transparency |

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

Please note also that the "Not met" labels in the Explanation boxes below do not necessarily mean that the company does not meet the requirements as they are described in the bullet point short text. Rather, it means that the analysts could not find information *in public sources* that met the requirements *as described in full* in the CHRB 2019 Methodology document. For example, a "Not met" under "General HRs Commitment", which is the first bullet point for indicator A.1.1, does not necessarily mean that the company does not have a general commitment to human rights. Rather, it means that the CHRB could not identify a public statement of policy in which the company commits to respecting human rights.

Detailed assessment

A. Governance and Policies (10% of Total)

A.1 Policy Commitments (5% of Total)

| Indicator Code | Indicator name | Score (out of 2) | Explanation |
|----------------|---|------------------|---|
| A.1.1 | Commitment to respect human rights | 0 | The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: General HRs commitment: Ralph Lauren states in its Corporate Responsibility Report makes reference to the importance of human rights but it is not clear if the company has a commitment to Human Rights. [Corporate Responsibility Report, 03/2018: careers.ralphlauren.com] Score 2 <ul style="list-style-type: none"> Not met: UNGPs Not met: OECD |
| 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"> Met: ILO Core: The Company discloses in its Operating Guidelines that Ralph Lauren and its affiliates are dedicated to conduct its operations throughout the world on principles of ethical business practices. In its document the Company states that it must not use child labor, does not work with forced labor, does not practice any form of discrimination and should respect the legal rights of employees to freely, and without harassment, participate in organizations of their choice and to bargain collectively. [Operating Guideline, 2019, 3/19: ralphlauren.com] Not met: UNGC principles 3-6 Met: Explicitly list ALL four ILO for AP suppliers: The Company states on its Website that requires all suppliers, factories, and contractors to adhere Company's Operating Guidelines in which is mentioned freedom of association and collective bargaining, prohibitions on child labor, forced labor, prison labor, discrimination, |

| Indicator Code | Indicator name | Score (out of 2) | Explanation |
|----------------|---|------------------|---|
| | | | <p>and harassment. With respect freedom of association and collective bargaining, the Company indicates: 'Suppliers should respect the legal rights of employees to freely, and without harassment, participate in organizations of their choice and to bargain collectively. Where the right to freedom of association and collective bargaining is restricted under law, the supplier allows the development of parallel means for independent and free association and bargaining.' [Operating Guideline, 2019, 3/19: ralphlauren.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Met: Explicit commitment to All four ILO Core: The Company discloses in its Operating Guidelines that Ralph Lauren and its affiliates are dedicated to conduct its operations throughout the world on principles of ethical business practices. In its document the Company states that suppliers must not use child labor, does not work with forced labor, does not practice any form of discrimination and 'should respect the legal rights of employees to freely, and without harassment, participate in organizations of their choice and to bargain collectively. Where the right to freedom of association and collective bargaining is restricted under law, the supplier allows the development of parallel means for independent and free association of bargaining.' [Operating Guideline, 2019, 3/19: ralphlauren.com] • Met: Respect H&S of workers: The Company states in its Operating Guideline that it must ensure that it provides a safe and healthy work environment for the employees, and they are not subject to unsanitary or hazardous conditions. [Operating Guidelines, Checked on 3/1/19: poloralphlaurenfactorystore.com] • Met: H&S applies to AP suppliers: The Company discloses in its Operating Guideline that business partners must ensure that their employees are provided a safe and healthy work environment, and are not subject to unsanitary or hazardous conditions. [Operating Guidelines, Checked on 3/1/19: poloralphlaurenfactorystore.com] • Not met: working hours for workers: The Company states in its Operating Guideline that 'employees must not be required to work excessive working hours and overtime and have at least one day off in seven'. However, no reference found to standard working hours. [Operating Guideline, 2019, 3/19: ralphlauren.com] • Not met: Working hours for AP suppliers: The statement above apply also for suppliers. However, no reference found to standard working hours. [Operating Guideline, 2019, 3/19: ralphlauren.com] |
| A.1.3.AP | Commitment to respect human rights particularly relevant to the industry (AP) | 1 | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Women's Rights • Not met: Children's Rights • Met: Migrant worker's rights: The Company discloses that all foreign migrant workers in Ralph Lauren Corporation's supply chain are entitled to the rights and protections. 'This reflects Ralph Lauren's commitment to internationally recognized migrant workers' rights as described by the International Labor Organization, and in the United Nations Dhaka Principles on Migration with Dignity. These rights extend to workers during recruitment, hiring, migration, employment and termination, and as such, shall be upheld by all factories in Ralph Lauren Corporation's operations'. [Foreign Migrant Worker Standard, March 2019: corporate.ralphlauren.com] • Met: Expecting suppliers to respect these rights: Ralph Lauren states that "all foreign migrant workers are entitled to have their rights describe the expectation that all foreign migrant workers in the supply chain are entitled to their rights respected and be protected from human trafficking and the use of forced labor. All of the Company's suppliers that employ foreign migrant workers must adhere to our Foreign Migrant Worker (FMW) Standards". [Corporate Responsibility Report, 03/2018: careers.ralphlauren.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: CEDAW/Women's Empowerment Principles • Not met: Child Rights Convention/Business principles • Not met: Convention on migrant workers • Not met: Respecting the right to water • Not met: Expecting suppliers to respect these rights |
| A.1.4 | Commitment to engage with stakeholders | 0 | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Commits to stakeholder engagement: The Company states that "will work with stakeholders in developing and carrying out implementation plans and commit to establishing due diligence, tracking, verification, and other systems to ensure the global operations and supply chains comply with Company's policy". However, this statement seems to be related to supply chain and its material issues, there is no evidence that the Company is committed to engage with its |

| Indicator Code | Indicator name | Score (out of 2) | Explanation |
|----------------|--|------------------|--|
| | | | <p>stakeholders in a wider context. [Corporate Responsibility Report, 03/2018: careers.ralphlauren.com]</p> <ul style="list-style-type: none"> • Not met: Regular stakeholder engagement <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Commits to engage stakeholders in design • Not met: Regular stakeholder design engagement: Although the Company discloses In its Corporate Responsibility Report that commits to consulting with key stakeholders in the development and implementation of its policies and plans to publicly report on implementation targets and outcomes, this commitment is related only to sourcing material, there is no mention about engagement with stakeholders and human rights issues. [Corporate Responsibility Report, 03/2018: careers.ralphlauren.com] |
| A.1.5 | Commitment to remedy | 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"> • Not met: Commits to remedy: The Company discloses that it performs audits, visits and remediation on the supplier's production operations. However, there is no evidence that it is committed to remedy incidents in their own operation. [Corporate Responsibility Report, 03/2018: careers.ralphlauren.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Not obstructing access to other remedies • Not met: Collaborating with other remedy initiatives • Met: Work with AP suppliers to remedy impacts: Ralph Lauren discloses that works to help its suppliers to remedy the compliance issue with the help of its third-party service providers. The Company also states that "will engage our suppliers and other supply chain partners to remediate practices that do not meet our policy, within a 6- to 12-month time frame". In addition, the Company states that "prefer to work with our contracted factories to remediate and improve rather than terminate our business partnership". [Corporate Responsibility Report, 03/2018: careers.ralphlauren.com & Corporate Responsibility Report, 03/2018: careers.ralphlauren.com] |
| A.1.6 | Commitment to respect the rights of human rights defenders | 0 | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Zero tolerance attacks on HRs Defenders (HRDs) <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Expects AP suppliers to reflect company HRD commitments |

A.2 Policy Commitments (5% of Total)

| Indicator Code | Indicator name | Score (out of 2) | Explanation |
|----------------|---------------------------------------|------------------|--|
| A.2.1 | Commitment from the top | 0 | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: CEO or Board approves policy • Not met: Board level responsibility for HRs <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Speeches/letters by Board members or CEO |
| A.2.2 | Board discussions | 0 | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Board/Committee review of salient HRs • Not met: Examples or trends re HR discussion <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both examples and process |
| A.2.3 | Incentives and performance management | 0 | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Incentives for at least one board member • Not met: At least one key AP HR risk, beyond employee H&S <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Performance criteria made public |

B. Embedding Respect and Human Rights Due Diligence (25% of Total)

B.1 Embedding Respect for Human Rights in Company Culture and Management Systems (10% of Total)

| Indicator Code | Indicator name | Score (out of 2) | Explanation |
|----------------|--|------------------|---|
| B.1.1 | Responsibility and resources for day-to-day human rights functions | 0 | The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Commits to ILO core conventions: See indicator A.1.2 [Operating Guideline, 2019, 3/19: ralphlauren.com] • Not met: Senior responsibility for HR Score 2 <ul style="list-style-type: none"> • Not met: Day-to-day responsibility • Not met: Day-to-day responsibility for AP in supply chain |
| B.1.2 | Incentives and performance management | 0 | The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Senior manager incentives for human rights • Not met: At least one key AP HR risk, beyond employee H&S Score 2 <ul style="list-style-type: none"> • Not met: Performance criteria made public |
| B.1.3 | Integration with enterprise risk management | 0 | The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: HR risks is integrated as part of enterprise risk system: Ralph Lauren discloses that in its risks assessment are included "evaluation of social, environmental, and governance risks associated with the specific sources for each commodity and prioritization of high-risk sources for additional due diligence, verification, and action". However, there is no mention about human rights risks integrates its enterprise risk system. [Corporate Responsibility Report, 03/2018: careers.ralphlauren.com] Score 2 <ul style="list-style-type: none"> • Not met: Audit Ctte or independent risk assessment |
| B.1.4.a | Communication /dissemination of policy commitment(s) within Company's own operations | 0 | The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Commits to ILO core conventions: See indicator A.1.2 [Operating Guideline, 2019, 3/19: ralphlauren.com] • Not met: Communicates its policy to all workers in own operations: Although Ralph Lauren discloses that it has a team dedicated to communicating with employees and engaging them in the Company's mission, using an employee intranet system in which is possible to monitor suggestions, comments and questions from the employees, it does not explicitly demonstrates a commitment to communicate human rights issues or policies. [Corporate Responsibility Report, 03/2018: careers.ralphlauren.com] Score 2 <ul style="list-style-type: none"> • Met: Commits to all 4 ILO core conventions • Not met: Communication of policy commitments to stakeholder • Not met: How policy commitments are made accessible to audience |
| B.1.4.b | Communication /dissemination of policy commitment(s) to business relationships | 0 | The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Commits to all 4 ILO core conventions for suppliers: See indicator A.1.2 [Operating Guideline, 2019, 3/19: ralphlauren.com] • Not met: Communicating policy down the whole AP supply chain: Although the Company states that it requires 'suppliers and service providers to comply with our Code of Ethical Conduct for Suppliers and Third-Party Service Providers', its communication process is not clear. [Corporate Responsibility Report, 03/2018: careers.ralphlauren.com] Score 2 <ul style="list-style-type: none"> • Not met: Requiring AP suppliers to communicate policy down the chain • Not met: How HR commitments made binding/contractual [Corporate Responsibility Report, 03/2018: careers.ralphlauren.com] • Not met: Including on AP suppliers [Corporate Responsibility Report, 03/2018: careers.ralphlauren.com] |
| 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"> • Met: Scores at least 1 on A.1.2 • Not met: Trains all workers on HR policy commitments: Ralph Lauren discloses that it provides training for supply chain executives and own employees on the prevention of human trafficking and slave labor in its UK and California Transparency Acts. However, there is no evidence of training for its general human |

| Indicator Code | Indicator name | Score (out of 2) | Explanation |
|----------------|---|------------------|---|
| | | | <p>rights commitments. [UK and California Transparency Acts., Checked on 3/1/19: ralphlauren.co.uk]</p> <ul style="list-style-type: none"> • Not met: Trains relevant AP managers including procurement [UK and California Transparency Acts., Checked on 3/1/19: ralphlauren.co.uk] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Score of 2 on A.1.2 • Not met: Both requirements under score 1 met |
| B.1.6 | Monitoring and corrective actions | 0.5 | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Scores at least 1 on A.1.2 • Not met: Monitoring implementation of HR policy commitments: The Company states that it maintains "internal accountability standards and procedures for employees and contractors failing to meet our Operating Guidelines". However, this applies only for suppliers, there is no mention to monitor its own operation. [UK and California Transparency Acts., Checked on 3/1/19: ralphlauren.co.uk] • Met: Monitoring AP suppliers: Ralph Lauren discloses that verifies "product supply chains using third-party auditors to ensure that our product supply chains are compliant with our Operating Guidelines and all applicable laws and regulations prohibiting slave labor and human trafficking" in its UK and California Transparency Acts. [UK and California Transparency Acts., Checked on 3/1/19: ralphlauren.co.uk] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Score of 2 on A.1.2 • Not met: Describes corrective action process • Not met: Example of corrective action • Not met: Discloses % of AP supply chain monitored: Although the Company provides a map describing from where its suppliers and manufactured materials come from, it does not disclose the percentage monitored. [Corporate Responsibility Report, 03/2018: careers.ralphlauren.com] |
| B.1.7 | Engaging business relationships | 1 | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: HR affects AP selection of suppliers: The Company discloses that, in accordance with the UK and California Transparency Acts, it requires certification by suppliers that materials incorporated into Ralph Lauren's products comply the Operation Guideline and all applicable laws and regulations prohibiting slave labor and human trafficking in countries where suppliers are doing business. However, it is not clear whether human rights is considered and affects the selection of potential suppliers. [UK and California Transparency Acts., Checked on 3/1/19: ralphlauren.co.uk] • Met: HR affects on-going AP supplier relationships: The Company states that engages with own suppliers and other supply chain partners to remediate practices that do not meet Ralph Lauren's policy, within a 6 to 12 month time frame. In the event that suppliers do not meet their remediation deadlines, The Company seeks to terminate the relationship within a 6 to 12 month time frame or sooner. [UK and California Transparency Acts., Checked on 3/1/19: ralphlauren.co.uk] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirement under score 1 met • Not met: Working with AP suppliers to improve performance: The Company states that engages with own suppliers and other supply chain partners to remediate practices that do not meet Ralph Lauren's policy, within a 6 to 12 month time frame. However, it is not clear whether it proactively works with suppliers to improve their human rights performance [Corporate Responsibility Report, 03/2018: careers.ralphlauren.com] |
| B.1.8 | Approach to engagement with potentially affected stakeholders | 0 | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Stakeholder process or systems • Not met: Frequency and triggers for engagement • Not met: Workers in AP SC engaged • Not met: Communities in the AP SC engaged <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Analysis of stakeholder views and company's actions on them |

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

| Indicator Code | Indicator name | Score (out of 2) | Explanation |
|----------------|--|------------------|--|
| B.2.1 | Identifying: Processes and triggers for identifying human rights risks and impacts | 0 | The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: Identifying risks in own operations: Although the Company has an evaluation of social, environmental, and governance risks associated with the specific sources and prioritization of high-risk sources for additional due diligence, verification, and action; it does not explicitly mention human rights risks, or whether it identifies human-right related risks in its own operations. [Corporate Responsibility Report, 03/2018: careers.ralphlauren.com] Not met: Identifying risks in AP suppliers Score 2 <ul style="list-style-type: none"> Not met: Ongoing global risk identification Not met: In consultation with stakeholders Not met: In consultation with HR experts Not met: Triggered by new circumstances |
| B.2.2 | Assessing: Assessment of risks and impacts identified (salient risks and key industry risks) | 0 | The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: Salient risk assessment (and context) Not met: Public disclosure of salient risks Score 2 <ul style="list-style-type: none"> Not met: Both requirements under score 1 met |
| B.2.3 | Integrating and Acting: Integrating assessment findings internally and taking appropriate action | 0 | The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: Action Plans to mitigate risks Not met: Including in AP supply chain Not met: Example of Actions decided Score 2 <ul style="list-style-type: none"> Not met: Both requirements under score 1 met |
| B.2.4 | Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts | 0 | The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: System to check if Actions are effective Not met: Lessons learnt from checking effectiveness Score 2 <ul style="list-style-type: none"> Not met: Both requirement under score 1 met |
| B.2.5 | Communicating : Accounting for how human rights impacts are addressed | 0 | The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: Comms plan re identifying risks Not met: Comms plan re assessing risks Not met: Comms plan re action plans for risks Not met: Comms plan re reviewing action plans Not met: Including AP suppliers Score 2 <ul style="list-style-type: none"> Not met: Responding to affected stakeholders concerns Not met: Ensuring affected stakeholders can access communications |

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

| Indicator Code | Indicator name | Score (out of 2) | Explanation |
|----------------|--|------------------|---|
| C.1 | Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers | 1.5 | The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Met: Channel accessible to all workers: The Company has a hotline and a website operated by a third party to ensure that employees have a safe and impartial place to bring their concerns in which anyone can make complaints. [Corporate Responsibility Report, 03/2018: careers.ralphlauren.com & Ralph Lauren Ethics point, Checked on 4/1/19: secure.ethicspoint.com] Score 2 <ul style="list-style-type: none"> Not met: Number grievances filed, addressed or resolved |

| Indicator Code | Indicator name | Score (out of 2) | Explanation |
|----------------|---|------------------|---|
| | | | <ul style="list-style-type: none"> • Met: Channel is available in all appropriate languages: The grievance mechanisms are available in all appropriate languages. [Ralph Lauren Ethics point, Checked on 4/1/19: secure.ethicspoint.com] • Not met: Expect AP supplier to have equivalent grievance systems • Not met: Opens own system to AP supplier workers: The Company discloses that "plan to distribute an improved Operating Guidelines and Supplier Hotline poster to promote and encourage management and worker communication with our Company". However, there is no evidence that suppliers can use Company's grievance mechanisms. [Corporate Responsibility Report, 03/2018: careers.ralphlauren.com] |
| 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"> • Not met: Grievance mechanism for community <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Describes accessibility and local languages • Not met: Expects AP supplier to have community grievance systems • Not met: AP supplier communities use global system |
| C.3 | Users are involved in the design and performance of the channel(s)/mechanism(s) | 0 | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Engages users to create or assess system • Not met: Description of how they do this <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Engages with users on system performance • Not met: Provides user engagement example on performance • Not met: AP suppliers consult users in creation or assessment |
| C.4 | Procedures related to the mechanism(s)/channel(s) are publicly available and explained | 0 | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Response timescales • Not met: How complainants will be informed <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Escalation to senior/independent level: The Company discloses that, grievances are communicated directly to corporate offices for follow-up on each reported issue. However, there is no evidence that the complaints received through the hotlines are escalated to more senior levels. [Corporate Responsibility Report, 03/2018: careers.ralphlauren.com] |
| C.5 | Commitment to non-retaliation over complaints or concerns made | 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"> • Met: Public statement prohibiting retaliation: The Company states in its Corporate Responsibility Report that it strictly prohibits retaliation against any person by an employee or by anyone representing Ralph Lauren Corporation for raising a concern or for otherwise assisting or participating in any manner of an investigation or other proceedings. [Corporate Responsibility Report, 03/2018: careers.ralphlauren.com] • Not met: Practical measures to prevent retaliation: The Company discloses that in some countries does not accept anonymous complaints. [Ralph Lauren Ethics point, Checked on 4/1/19: secure.ethicspoint.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Has not retaliated in practice • Not met: Expects AP suppliers to prohibit retaliation |
| C.6 | Company involvement with State-based judicial and non-judicial grievance mechanisms | 0 | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Won't impede state based mechanisms • Not met: Complainants not asked to waive rights <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Will work with state based or non judicial mechanisms • Not met: Example of issue resolved (if applicable) |
| C.7 | Remedying adverse impacts and incorporating lessons learned | 0 | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Describes how remedy has been provided • Not met: Says how it would remedy key sector risks <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Changes introduced to stop repetition • Not met: Approach to learning from incident to prevent future impacts |

| Indicator Code | Indicator name | Score (out of 2) | Explanation |
|----------------|----------------|------------------|--|
| | | | • Not met: Evaluation of the channel/mechanism |

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

| Indicator Code | Indicator name | Score (out of 2) | Explanation |
|----------------|---|------------------|--|
| D.2.1.b | Living wage (in the supply chain) | 0 | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Living wage in supplier code or contracts: The Company states in its Operating Guidelines that "business partners must comply with all laws regulating local wages, overtime compensation, and legally mandated benefits. Wage and benefit policies must be consistent with prevailing national standards". However, there is no mention to living wage. [Operating Guidelines, Checked on 3/1/19: poloralphlaurenfactorystore.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Improving living wage practices of suppliers • Not met: Both requirements under score 1 met • Not met: Provide analysis of trends demonstrating progress |
| D.2.2 | Aligning purchasing decisions with human rights | 0 | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Avoids business model pressure on HRs • Not met: Positive incentives to respect human rights <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met |
| D.2.3 | Mapping and disclosing the supply chain | 0 | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Identifies suppliers back to product source: The Company provides a map demonstrating the percentage of manufacturing by continent, but it is not clear if maps suppliers in a more specific level. [Corporate Responsibility Report, 03/2018: careers.ralphlauren.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Discloses significant parts of supply chain and why |
| D.2.4.b | Prohibition on child labour: Age verification and corrective actions (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"> • Not met: Child Labour rules in codes or contracts: The Company states in its operating guidelines that "suppliers must not use child labor, defined as employees under the age of 16. Employees between the ages of 16 and 18 should not be subject to night work or hazardous work. Apprenticeship programs will be reviewed on an individual basis". However, no evidence found in relation to age verification requirements and remediation programmes in case child labour is found. [Operating Guidelines, Checked on 3/1/19: poloralphlaurenfactorystore.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: How working with suppliers on child labour • Not met: Both requirements under score 1 met • Not met: Provide analysis of trends demonstrating progress |
| D.2.5.b | Prohibition on forced labour: Debt bondage and other unacceptable financial costs (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"> • Not met: Debt and fees rules in codes or contracts: The Company indicates that "Our Foreign Migrant Workers Policy mandates ethical recruitment practices, including mandatory local language employment contracts, and the prohibition of worker-paid fees and end of contract travel expenses". However, it is not clear if this applies to all suppliers' workers or only migrant workers and if this is part of contractual arrangement. [UK and California Transparency Acts., Checked on 3/1/19: ralphlauren.co.uk] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: How working with suppliers on debt & fees • Not met: Both requirements under score 1 met • Not met: Provide analysis of trends in progress made |

| 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"> • Met: Free movement rules in codes or contracts: The company's Migrant Workers Standards state that "in addition to our Operating Guidelines, under the Foreign Migrant Worker Standards, all foreign migrant workers in Ralph Lauren Corporation's supply chain are entitled to the rights and protections presented in the Standard. This [Standards] reflects Ralph Lauren's commitment to internationally recognized migrant workers' rights as described by the International Labor Organization, and in the United Nations Dhaka Principles on Migration with Dignity. Furthermore, The company Operating Guidelines state that "these rights extend to workers during recruitment, hiring, migration, employment and termination, and as such, shall be upheld by all factories in Ralph Lauren Corporation's operations." [Foreign Migrant Worker Standard, March 2019: corporate.ralphlauren.com & Operating Guideline, 2019, 3/19: ralphlauren.com] • Not met: How these practices are implemented and monitored for agencies, labour brokers or recruiters <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met • Not met: Provide analysis of trends in progress made |
| D.2.6.b | Freedom of association and collective bargaining (in the supply chain) | 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"> • Met: FoA & CB rules in codes or contracts: The Company states in its Operating Guideline that business partners should respect the legal rights of employees to freely, and without harassment, participate in organizations of their choice and also collective bargaining. It also indicates that "workers who have made the decision to participate in such organizations shall not be the object of discrimination or disciplinary actions. Representatives of the organizations shall have access to their members under conditions of local laws or mutual agreement between the employer and the organization". [Operating Guideline, 2019, 3/19: ralphlauren.com] • Not met: How working with suppliers on FoA and CB <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met • Not met: Provide analysis of trends in progress made |
| D.2.7.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"> • Met: Sets out clear Health and Safety requirements: Ralph Lauren discloses that its "suppliers must ensure that their employees are provided a safe and healthy work environment, and are not subject to unsanitary or hazardous conditions. We work with our suppliers to continuously improve health and safety within their manufacturing and workers' premises whenever and as often as needed, regardless of their location or proximity to the main Company. We expect our suppliers to monitor their factories and their approved subcontractors". [Corporate Responsibility Report, 03/2018: careers.ralphlauren.com] • Not met: Injury rate disclosures • Not met: Lost days or near miss disclosures • Not met: Fatalities disclosures <p>Score 2</p> <ul style="list-style-type: none"> • Met: How working with suppliers on H&S: A third-party service provider conducts the onsite evaluation in suppliers and determines scores in few areas based on compliance levels, which includes health and safety. Each area is evaluated, given a score and, if needed, provided with a recommended corrective action plan that must be achieved within a specified time frame. Suppliers will not be granted approval to manufacture Ralph Lauren Corporation product until satisfactory scores across all areas are achieved. The corrective action process begins immediately, with factories partnering with our onboarding teams to carry out improvements". The Company works with each supplier until the necessary improvements are made. [Corporate Responsibility Report, 03/2018: careers.ralphlauren.com] • Not met: Provide analysis of trends in progress made |
| D.2.8.b | Women's rights (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"> • Not met: Women's rights in codes or contracts • Not met: How working with suppliers on women's rights <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirement under score 1 met • Not met: Provide analysis of trends in progress made |

| Indicator Code | Indicator name | Score (out of 2) | Explanation |
|----------------|-------------------------------------|------------------|--|
| D.2.9.b | Working hours (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"> • Not met: Working hours in codes or contracts: The Operating Guidelines state that 'all regular and overtime hours must be voluntary and in accordance with national laws. Employees must not be required to work excessive working hours and overtime and have at least one day off in seven'. However, no details found in relation to standard working hours and overtime. [Operating Guidelines, Checked on 3/1/19: poloralphlaurenfactorystore.com] • Met: How working with suppliers on working hours: The Company discloses in its Corporate Responsibility Report that: it encourages "suppliers to be transparent about all working hours and to acknowledge the negative repercussions of excessive hours. Rather than penalizing a factory for excessive working hours, we first work to help them understand the issues and remediate. Together with the help of our third-party service providers, we are able to help our suppliers concentrate their efforts on developing a sustainable legal and balanced work week by capacity building and increased efficiencies throughout their manufacturing facilities." [Corporate Responsibility Report, 03/2018: careers.ralphlauren.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met [Operating Guidelines, Checked on 3/1/19: poloralphlaurenfactorystore.com & Corporate Responsibility Report, 03/2018: careers.ralphlauren.com] • Not met: Provide analysis of trends in progress made |

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

| Indicator Code | Indicator name | Score (out of 2) | Explanation |
|----------------|-------------------------|------------------|--|
| E(1).0 | Serious allegation No 1 | | No allegations meeting the CHRB severity threshold were found, and so the score of 10.49 out of 80 points scored in themes A-D & F has been applied to produce a score of 2.62 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 | 1.1 out of 4 | Out of a total of 40 indicators assessed under sections A-D of the benchmark, Ralph Lauren made data public that met one or more elements of the methodology in 11 cases, leading to a disclosure score of 1.1 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"> • Met: Company reports on GRI: The Company reports on GRI [Global Citizenship Sustainability Report Standard Supplement, March, 2019: corporate.ralphlauren.com] • Not met: Company reports on SASB • Not met: Company reports on UNGPRF |
| F.3 | Key, High Quality Disclosures | 0 out of 4 | <p>Ralph Lauren met 0 of the 8 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"> • Not met: Score 2 for A.2.2 : Board discussions • Not met: Score 2 for B.1.6 : Monitoring and corrective actions • Not met: Score 2 for C.1 : Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers • Not met: Score 2 for C.3 : Users are involved in the design and performance of the channel(s)/mechanism(s) <p>Discussing challenges openly</p> <ul style="list-style-type: none"> • Not met: Score 2 for B.2.4 : Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts • Not met: Score 2 for C.7 : Remedying adverse impacts and incorporating lessons learned <p>Demonstrating a forward focus</p> <ul style="list-style-type: none"> • Not met: Score 2 for A.2.3 : Incentives and performance management • Not met: Score 2 for B.1.2 : Incentives and performance management |

Disclaimer

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

See the 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.

No representation or warranty is given that the material in the Benchmark is accurate, complete or up-to-date. The material in the Benchmark is based on information that we consider correct and any statements, opinions, conclusions or recommendations contained therein are honestly and reasonably held or made at the time of publication. Any opinions expressed are our current opinions as of the date of the publication of the Benchmark only and may change without notice. Any views expressed in the Benchmark only represent the views of CHRB Ltd, unless otherwise expressly noted.

While the material contained in the Benchmark has been prepared in good faith, neither CHRB Ltd nor any of its agents, representatives, advisers, affiliates, directors, officers or employees accept any responsibility for or make any representation or warranty (either express or implied) as to the truth, accuracy, reliability or completeness of the information contained in this Benchmark or any other information made available in connection with the Benchmark. Neither CHRB Ltd nor any of its agents, representatives, advisers, affiliates, directors, officers and employees undertake any obligation to provide the users of the Benchmark with additional information or to update the information contained therein or to correct any inaccuracies which may become apparent (save as to the extent set out in CHRB Ltd's appeals procedure). To the maximum extent permitted by law any responsibility or liability for the Benchmark or any related material is expressly disclaimed provided that nothing in this disclaimer shall exclude any liability for, or any remedy in respect of, fraud or fraudulent misrepresentation. Any disputes, claims or proceedings this in connection with or arising in relation to this Benchmark will be governed by and construed in accordance with English law and submitted to the exclusive jurisdiction of the courts of England and Wales.

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.