

**Company Name** Samsung Electronics  
**Industry** ICT (Own operations and Supply Chain)  
**Overall Score (\*)** 39.6 out of 100

Theme Score	Out of	For Theme
2.8	10	A. Governance and Policies
10.1	25	B. Embedding Respect and Human Rights Due Diligence
5.4	15	C. Remedies and Grievance Mechanisms
4.5	20	D. Performance: Company Human Rights Practices
11.7	20	E. Performance: Responses to Serious Allegations
5.2	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	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>Met: General HRs commitment: In its Business Conduct Guidelines, the Company states: 'Samsung respects and protects the fundamental human rights taking into account international human rights principles and standards set forth in the Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights, the Organization for Economic Co-operation and Development's guidelines for multinational enterprises, the UN Convention on the Rights of the Child, the ILO Declaration on Fundamental Principles and Rights at Work, and the laws of the countries in which we operate.' [Business Conduct Guidelines 2016, 2016: <a href="https://www.samsung.com">samsung.com</a>]</li> <li>Not met: UDHR: See above. However, 'taking into account' is not consider a clear commitment statement.</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>Not met: UNGPs: See above. However, 'taking into account' is not consider a clear commitment statement. [Business Conduct Guidelines 2016, 2016: <a href="https://www.samsung.com">samsung.com</a>]</li> <li>Not met: OECD: See above. However, 'taking into account' is not consider a clear commitment statement. [Business Conduct Guidelines 2016, 2016: <a href="https://www.samsung.com">samsung.com</a>]</li> </ul>
A.1.2	Commitment to respect the human rights of workers	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>Not met: ILO Core [Business Conduct Guidelines 2016, 2016: <a href="https://www.samsung.com">samsung.com</a>]</li> <li>Not met: UNGC principles 3-6</li> <li>Not met: Explicitly list ALL four ILO for ICT suppliers: Its Supplier Code of Conduct includes the following provisions: 'Forced, bonded (including debt bondage) or</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>indentured labor, involuntary prison labor, slavery or trafficking of persons shall not be used.' ; 'Child labor must not be used in any stage of manufacturing.'; 'Companies shall not engage in discrimination based on race, color, age, gender, [...] or marital status in hiring and employment practices such as wages, promotions, rewards, and access to training.'; 'In conformance with local law, Suppliers shall respect the right of all workers to form and join worker council or trade unions of their own choosing, to bargain collectively and to engage in peaceful assembly as well as respect the right of workers to refrain from such activities.' However, it is not clear whether the Company is requiring to respecting freedom of association and collective bargaining rights in all contexts, as it indicates 'in conformance with local law'. [Supplier Code of Conduct, 01/2018: <a href="https://www.samsung.com">samsung.com</a>]</p> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Explicit commitment to All four ILO Core: See above. [Business Conduct Guidelines 2016, 2016: <a href="https://www.samsung.com">samsung.com</a>]</li> <li>• Met: Respect H&amp;S of workers: In addition, the Company indicates that its 'highest priority is to ensure the health and safety of our employees and communities. We strive to provide a safe working environment for all Samsung employees.' [Business Conduct Guidelines 2016, 2016: <a href="https://www.samsung.com">samsung.com</a>]</li> <li>• Met: H&amp;S applies to ICT suppliers: Its Supplier Code include a section with respect Health and Safety, which says: 'Suppliers shall ensure to maintain safe and healthy working conditions according to the local laws and regulations.' The Code include provisions related to: Occupational Safety, Emergency Preparedness, Occupational Injury and Illness, Industrial Hygiene, Food, Sanitation and Housing among others. [Supplier Code of Conduct, 01/2018: <a href="https://www.samsung.com">samsung.com</a>]</li> <li>• Not met: working hours for workers: According to its Business Conduct Guidelines 'Working hours are decided according to the characteristics of each work area and the related regulations in each country.' No further details found. [Business Conduct Guidelines 2016, 2016: <a href="https://www.samsung.com">samsung.com</a>]</li> <li>• Not met: Working hours for ICT suppliers: With respect 'Working hours', its Supplier Code indicates: 'Working hours are not to exceed the maximum set by local law. Further, a workweek should not be more than 60 hours per week, including overtime, except in emergency or unusual situations. Workers shall be allowed at least one day off every seven days.' However, no evidence found of references to standard weekly hours or the Company explicitly committing to respect ILO conventions on working hours. In addition, it is not clear what 'exceptional or unusual situations would be. [Supplier Code of Conduct, 01/2018: <a href="https://www.samsung.com">samsung.com</a>]</li> </ul>
A.1.3.ICT.a	Commitment to responsible sourcing of minerals	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Responsible mineral sourcing in conflict areas: In its Business Conduct Guidelines, the Company states: 'We strive to provide our customers with products using minerals sourced in an ethical manner based on the responsible management of the supply chain, and strongly prohibit using conflict minerals.' In addition, the Company has developed its Responsible Sourcing of Minerals Policy, where it states that 'the minerals used in our products meet the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.' In addition, the Company states that it 'considers environmental deterioration and human rights violations in conflict areas in 10 African countries, including DR Congo, [...]'. [Business Conduct Guidelines 2016, 2016: <a href="https://www.samsung.com">samsung.com</a> &amp; Policy to Responsible Sourcing: <a href="https://www.samsung.com">samsung.com</a>]</li> <li>• Met: Based on OECD Guidance: See above. It also indicates: 'To establish a conflict-free system, we have implemented a process of due diligence for conflict minerals in line with the 'OECD Due Diligence Guidance'. [...] 'We take our role seriously to source ethically and responsibly throughout our supply chain, including ensuring that the minerals used in our products meet the used in our products meet the 'OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict Affected and High-Risk Areas' .' [Policy to Responsible Sourcing: <a href="https://www.samsung.com">samsung.com</a>]</li> <li>• Not met: Requires responsible mineral sourcing from suppliers: In its Supplier Code, the Company indicates: 'In supply chain of Samsung, Suppliers, at any rate, shall not use minerals (such as tantalum, tungsten, tin, gold, cobalt, etc.) and illegally timbered raw materials from any area, where it can cause serious human rights abuses and environmental destruction in the international community. [...] Suppliers shall exercise due diligence on the source and chain of custody of these materials and make their due diligence measures available to Samsung upon Samsung's request.' In addition, in its 2019 Sustainability Report, the Company</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>indicates: 'We are committed to ethical and responsible sourcing throughout our supply chain by applying the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas. We also require our suppliers to adopt the Samsung Electronics Supplier Code of Conduct, which was developed in line with international human rights guidelines. Moreover, we urge our industry peers and stakeholders to promote the responsible sourcing of minerals through RMI (Responsible Mineral Initiative), GeSI (Global e-Sustainability Initiative) and EPRM (European Partnership for Responsible Minerals). Also, as a member of the RMI steering committee, we collaborate with industry on governance standards for responsible minerals.' However, the Supplier Code (or other requirements for suppliers) does not make reference to require suppliers carry out due diligence processes following OECD Guidance. [Supplier Code of Conduct, 01/2018: <a href="http://samsung.com">samsung.com</a> &amp; 2019 Sustainability Report, 2019: <a href="http://samsung.com">samsung.com</a>]</p> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Responsible conflict mineral sourcing covers all minerals: It also indicates: '[...] we have banned the use of conflict minerals - including tantalum, tin, tungsten and gold - that are mined unethically in conflict regions. [...] Responsible minerals are defined as minerals that give rise to potential human rights violations or environmental destruction during mining process, in addition to conflict minerals in the DRC and neighbouring countries. Additionally, we have been reviewing the status of our use of cobalt in responded to the issue of underage workers in cobalt mine in the Democratic Republic of the Congo.' However, no evidence found to commitment to responsible sourcing covering explicitly all minerals as references are made to 3TG and specific case about cobalt. [Policy to Responsible Sourcing: <a href="http://samsung.com">samsung.com</a>]</li> <li>• Met: Suppliers expected to make similar requirements of their suppliers: See above. In addition, the Company also indicates that 'To ensure our suppliers are held to the highest standards, we conduct thorough examinations on the minerals used in their products.' The Company's Supplier Code requires to its suppliers to not use minerals and illegally timbered raw materials from any area, where it can cause serious human rights abuses. Commitment for supply chain seems to cover minerals in general. [Supplier Code of Conduct, 01/2018: <a href="http://samsung.com">samsung.com</a>]</li> </ul>
A.1.3.ICT.b	Commitment to respect human rights particularly relevant to the industry (ICT)	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Women's Rights</li> <li>• Met: Children's Rights: The Company states in its Child Labor Prohibition Policy that it 'respects and supports children's rights as articulated in the UN Convention on the Rights of the Child.' In addition, in its Business Conduct Guidelines, the Company indicates: 'Our policy against child labor is based on the UN Convention on the Rights of the Child, The Children's Rights and Business Principles, and ILO Convention. It requires all of our subsidiaries, as well as all of our suppliers, to comply with the policy.' [Child Labor Prohibition Policy in China, 06/2014: <a href="http://samsung.com">samsung.com</a> &amp; Business Conduct Guidelines 2016, 2016: <a href="http://samsung.com">samsung.com</a>]</li> <li>• Not met: Migrant worker's rights: The Company developed its Migrant worker Guidelines, which 'ban the collection of recruitment fee, states that labor contracts shall be provided in the language of the migrant workers, and bans inhumane and discriminatory treatment.' However, no reference found to migrant worker's rights. [Migrant Worker Guidelines, 12/2016: <a href="http://samsung.com">samsung.com</a>]</li> <li>• Met: Expecting suppliers to respect these rights: See above. Suppliers are required to comply with Child Labor Prohibition Policy; Additionally the company includes the following statement in its supplier Code of Conduct in relation to Migrant worker rights "Suppliers must uphold the human rights of workers, and treat them with dignity and respect as understood by the international community. This applies to all workers including... migrant...and any other type of worker. [Business Conduct Guidelines 2016, 2016: <a href="http://samsung.com">samsung.com</a> &amp; Supplier Code of Conduct Guide, 03/2018: <a href="http://samsung.com">samsung.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: CEDAW/Women's Empowerment Principles</li> <li>• Not met: Child Rights Convention/Business principles: See above. However, to be 'based on' or 'as articulated in' are not consider clear commitment statements. [Child Labor Prohibition Policy in China, 06/2014: <a href="http://samsung.com">samsung.com</a> &amp; Business Conduct Guidelines 2016, 2016: <a href="http://samsung.com">samsung.com</a>]</li> <li>• Not met: Convention on migrant workers</li> <li>• Not met: Expecting suppliers to respect these rights</li> </ul>
A.1.4	Commitment to engage with stakeholders	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Commits to stakeholder engagement</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Met: Regular stakeholder engagement: In its Sustainability Report 2019, the Company discloses information about its Stakeholder Engagement and Communication activities, which shows evidence of regularly engagement with several stakeholder groups including local communities, employers and suppliers. [2019 Sustainability Report, 2019: <a href="https://www.samsung.com">samsung.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Commits to engage stakeholders in design</li> <li>• Not met: Regular stakeholder design engagement</li> </ul>
A.1.5	Commitment to remedy	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Commits to remedy: In its Sustainability Report 2017, the Company states: 'We develop wide-ranging policies under the principle of talent management to fulfil our corporate responsibility in respecting, protecting and remedying human rights. Moreover, the Company has developed some Remediation Programs, such as its Child Labor Remediation Program included in its Child Labor Prohibition Policy in China or the Remedial procedure included in its Guidelines on the Prevention of Harassment. However, CHRB could not find a general statement committing to remedy the adverse impacts on individuals, workers and communities that it has caused or contributed to. [Sustainability Report 2017: <a href="https://www.samsung.com">samsung.com</a> &amp; Child Labor Prohibition Policy in China, 06/2014: <a href="https://www.samsung.com">samsung.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Not obstructing access to other remedies</li> <li>• Not met: Collaborating with other remedy initiatives</li> <li>• Not met: Work with ICT 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 ICT 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>• Not met: CEO or Board approves policy: According to its Governance Report: 'The Board makes resolutions [...] and on important matters concerning basic policies and execution of the Company's business'. However, CHRB could not find a specific statement where it was clear that its Business Conduct Guideline was approved by the CEO or the Board. [Corporate Governance Report 2018: <a href="https://images.samsung.com">images.samsung.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Met: Board level responsibility for HRs: The Company indicates that 'under the Governance Committee, we operate the CSR (Corporate Social Responsibility) Risk Management Council to strengthen the oversight of the Board on risk response and management. [...] We report agendas of non-financial risks—including topics such as climate change, labor and human rights, and operational health and safety—to the Board of Directors as critical issues. Through the reporting, our Board of Directors thoroughly examine the issues and comprehensively manages the potential risks'. [2019 Sustainability Report, 2019: <a href="https://www.samsung.com">samsung.com</a>]</li> <li>• Not met: Speeches/letters by Board members or CEO</li> </ul>
A.2.2	Board discussions	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Met: Board/Committee review of salient HRs: According to the Sustainability report: 'under the Governance Committee, we operate the CSR (Corporate Social Responsibility) Risk Management Council to strengthen the oversight of the Board on risk response and management. The Council oversees the internal management system for CSR Risks and discusses solutions to resolve arising issues. Independent Directors and related departments participate to hold the Council on a quarterly basis and discuss the agenda. We report agendas of non-financial risks—including topics such as climate change, labor and human rights, and operational health and safety—to the Board of Directors as critical issues. Through the reporting, our Board of Directors thoroughly examine the issues and comprehensively manages the potential risks'. [2019 Sustainability Report, 2019: <a href="https://www.samsung.com">samsung.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Examples or trends re HR discussion</li> <li>• Not met: Both examples and process</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
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 ICT 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	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Commits to ILO core conventions: See indicator A.1.2</li> <li>• Not met: Senior responsibility for HR: The Company states in its 2019 Sustainability Report that: ' Through the Management Committee (consisting of CEOs) and the Risk Council (led by CFO), non-financial risks including the corporate sustainability issue are also reviewed. In his role as a Chief Risk Officer for the entire company, the CFO leads the Risk Council which brings together the heads of various departments, including Legal, Human Resources, Communications, Public Affairs, Global Environment, Health and Safety Center, Partner Collaboration Center, and Global Product Quality Innovation, allowing them to collectively discuss and manage risks, including sustainability risks, in a holistic way across departments and functions.' However, these tasks are focused on risk management. In addition, in its Sustainability Report 2018, the Company indicates that : 'Our Compliance-related committees and the Privacy Steering Committee assists our top management in their decision-making processes. Under each committee, Samsung Business Divisions and Regional Offices are responsible for compliance and privacy at the local level.' According to the table presented by the Company, Human Resources Team is responsible for Compliance with labor standards and posting of HR regulations; Corporate Compliance Team is responsible for Strategic resources and management of conflict minerals use; and Global EHS Center is responsible for Environment &amp; Safety of workplaces and products. However, it is not clear if there is a senior person/body in charge of centralising responsibility for human rights issues in general within the Company. [Sustainability Report 2018: <a href="https://www.samsung.com">samsung.com</a> &amp; 2019 Sustainability Report, 2019: <a href="https://www.samsung.com">samsung.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Met: Day-to-day responsibility: See above. It also presents a table where it sets out the responsible unit for compliance and privacy across the organization, including the responsible Units for: Compliance with labor standards; Environment &amp; Safety of workplaces and products; Strategic resources, management of conflict minerals use. [2019 Sustainability Report, 2019: <a href="https://www.samsung.com">samsung.com</a>]</li> <li>• Not met: Day-to-day responsibility for ICT in supply chain: See above. In addition, the Company states that 'In order to resolve and remediate key issues in the areas of labor relations and human rights (e.g., involving child labor, migrant workers, conflict minerals, privacy, and personal data), we manage risks and develop improvement measures throughout the supply chain with all the related teams in charge.' However, no further details found about related teams in charge. [2019 Sustainability Report, 2019: <a href="https://www.samsung.com">samsung.com</a>]</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: In its Corporate Governance Report 2018, the Company states that it employs 'an incentive system (Target Achievement Incentive and Performance Incentive), under which compensation differs depending on the annual achievement of a business division (target achievement, profit generated, etc.)'. However, CHRB could not find further information describing the incentive mechanism in order to determine whether human rights aspects are included. [Corporate Governance Report 2018: <a href="https://images.samsung.com">images.samsung.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: At least one key ICT HR risk, beyond employee H&amp;S</li> <li>• Not met: Performance criteria made public</li> </ul>
B.1.3	Integration with enterprise risk management	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Met: HR risks is integrated as part of enterprise risk system: In its Sustainability Report 2019, the Company indicates: 'As a global leader in the IT industry, we identify both external and internal risk factors causing business uncertainty,</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>including sustainability risks such as human rights risks or environmental risks, and we respond to this uncertainty to strengthen our sustainable competitiveness in the market. In line with top management's commitment to risk management, we established a systemized risk response policy and process for each business division. [...] We report identified risk factors to top management to respond to the risk factors in an efficient, effective manner. [...] In addition, in its Corporate Governance Report 2018, the Company states: 'The Company's CSR Committee (which expanded into the Governance Committee) recognizes risks related to corporate social responsibility as important matters to manage and pursues ways to better address such risks. [...] ' The Company refers to human rights as a CSR element in its Business Conduct Guidelines (page 12). [2019 Sustainability Report, 2019: <a href="https://www.samsung.com">samsung.com</a> &amp; Corporate Governance Report 2018: <a href="https://images.samsung.com">images.samsung.com</a>]</p> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Audit Ctte or independent risk assessment</li> </ul>
B.1.4.a	Communication /dissemination of policy commitment(s) within Company's own operations	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Commits to ILO core conventions: See indicator A.1.2</li> <li>• Met: Communicates its policy to all workers in own operations: The Company indicates in its Sustainability Report 2018 that it provides 'a range of training programs to help employees build capacity through partnership with specialized external expert organizations. Furthermore, we developed training programs as a way to enhance employee awareness regarding labor and human rights, diversity and grievance resolution procedures. These training programs are mandatory for employees worldwide and cater to the unique cultural characteristics of our global workplaces.' The description of its training program is the following: '15 courses in a total of six domains, including the vision of our human rights management, our policy to adhere to employee human rights standards(such as ban on forced labor, discrimination, workplace harassment), respect for diversity, strengthened internal communication, mental fitness management, in-house grievance handling channels, etc.' No new relevant evidence found in its last report. [Sustainability Report 2018: <a href="https://www.samsung.com">samsung.com</a>] <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Commits to all 4 ILO core conventions: See indicator A.1.2</li> <li>• Not met: Communication of policy commitments to stakeholder</li> <li>• Not met: How policy commitments are made accessible to audience</li> </ul> </li></ul>
B.1.4.b	Communication /dissemination of policy commitment(s) to business relationships	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Commits to all 4 ILO core conventions for suppliers: See indicator A.1.2</li> <li>• Met: Requiring ICT suppliers to communicate policy down the chain: In its Sustainability Report 2019, the Company indicates: 'Our standard supplier contract signed with first-tier suppliers stipulates abiding by the Samsung Electronics Environmental Standard, the Samsung Electronics Supplier Code of Conduct, and international human rights standards.' According to its Supplier Code of Conduct: 'All Suppliers shall adhere to the Code and ensure all of their direct or indirect sub-suppliers related to assembly, components, raw materials and packaging comply with the Code'. [Supplier Code of Conduct, 01/2018: <a href="https://www.samsung.com">samsung.com</a> &amp; 2019 Sustainability Report, 2019: <a href="https://www.samsung.com">samsung.com</a>] <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: How HR commitments made binding/contractual: See above [2019 Sustainability Report, 2019: <a href="https://www.samsung.com">samsung.com</a> &amp; Supplier Code of Conduct, 01/2018: <a href="https://www.samsung.com">samsung.com</a>]</li> <li>• Met: Including on ICT suppliers: It also indicates: 'First-tier suppliers are required to sign a standard contract form with second-tier suppliers that are engaged in the production of the items supplied to Samsung Electronics. It includes the same level of compliance that we ask of our first-tier suppliers'. [2019 Sustainability Report, 2019: <a href="https://www.samsung.com">samsung.com</a>]</li> </ul> </li></ul>
B.1.5	Training on Human Rights	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Scores at least 1 on A.1.2</li> <li>• Met: Trains all workers on HR policy commitments: The Company indicates that it provides 'a range of training programs to help employees build capacity through partnership with specialized external expert organizations. Furthermore, we developed training programs as a way to enhance employee awareness regarding labor and human rights, diversity and grievance resolution procedures. These training programs are mandatory for employees worldwide and cater to the unique cultural characteristics of our global workplaces.' No new relevant evidence found in its last report. [Sustainability Report 2018: <a href="https://www.samsung.com">samsung.com</a>] </li></ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Not met: Trains relevant ICT managers including procurement: 'All of our purchasing personnel must adhere to our 'Procurement Code of Conduct' which consists of our 'Charter of Purchasing Practices,' 'Standards and Principles of Purchasing,' 'Ethical Standards for Purchasing,' and 'Socially Responsible Purchasing'. We also provide education to all of our purchasing personnel across the world; nearly 85% of global purchasing personnel were trained annually on Procurement Code of Conduct through online and offline programs.' However, the Procurement Code of Conduct was not found in public domain in order to evaluate whether this Code cover human rights. No new relevant evidence found in last report. [Sustainability Report 2018: <a href="https://www.samsung.com">samsung.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: Both requirements under score 1 met</li> </ul>
B.1.6	Monitoring and corrective actions	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Scores at least 1 on A.1.2: See indicator A.1.2</li> <li>• Met: Monitoring implementation of HR policy commitments: In its Sustainability Report 2019, the Company indicates: 'We operate a worksite monitoring system, where we regularly evaluate compliance management levels and improvement activities at each worksite, and a risk analysis system, where we assess various internal and external indicators to identify factors that could adversely affect human rights. [...] Every year, we identify our priorities for risk assessment and capacity building in the areas of labor and human rights, as well as environment, health and safety based on registered data from our worksites monitoring system and risk analysis system. For the selected worksites, we provide annual labor and human rights expert consultations'. [2019 Sustainability Report, 2019: <a href="https://www.samsung.com">samsung.com</a>]</li> <li>• Met: Monitoring ICT suppliers: The Company describes in its Sustainability Report 2019 its Integrated Working Environment Management Process which has 3 steps: 1. Annual self-assessment of all first-tier suppliers using 85 RBA-based criteria; 2. On-site audits on "priority suppliers" selected according to location, transaction volume, past track records on compliance and self-assessment outcomes to identify improvement tasks. (Conduct on-site audits on 407 suppliers in 2018). On-site audits led by RBA-certified auditors and performed by dedicated team[...]. Interview suppliers' employees [...]; 3. Third-party Audits: RBA-certified third-party external audit firm randomly selects suppliers and performs initial audits based on the RBA criteria (306 suppliers on a cumulative basis since 2013). [2019 Sustainability Report, 2019: <a href="https://www.samsung.com">samsung.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: The Company indicates that 'underperformers are required to take corrective measures and are subject to penalties, including reductions on transaction volume and restrictions on additional transactions.' It also discloses the proportion of suppliers rated as high performers in 2018: 64% and the supplier compliance results by key third-party verification item, which includes: Labor and Human Rights issues (Prohibition of child labor, work hour management, Guarantee of one-day off per week, etc.). The results are disclosed as the proportion of suppliers which comply with a specific provision. However, no evidence found in relation to the number of non-compliances found. [2019 Sustainability Report, 2019: <a href="https://www.samsung.com">samsung.com</a>]</li> <li>• Not met: Example of corrective action</li> <li>• Not met: Discloses % of ICT supply chain monitored: In its Sustainability Report 2019, the Company indicates it conducted on-site audits on 407 suppliers. However, it is not clear which proportion of its supply chain was monitored. [2019 Sustainability Report, 2019: <a href="https://www.samsung.com">samsung.com</a>]</li> </ul>
B.1.7	Engaging business relationships	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: HR affects ICT selection of suppliers: The Company indicates in its Sustainability Report 2018 that it evaluates 'We evaluate candidate suppliers based on five criteria—procurement and quality, EHS (Environment, Health and Safety), labor and human rights, Eco-Partner, and financial status. Only those that score 80 points or higher out of 100 points in all five criteria qualify to register as a Samsung Electronics supplier. For the EHS, labor and human rights, and Eco-Partner domains, we use a checklist based on RBA standards to perform intensive reviews.' [2019 Sustainability Report, 2019: <a href="https://www.samsung.com">samsung.com</a>]</li> <li>• Met: HR affects on-going ICT supplier relationships: According to its Supplier Code of Conduct 'If major failures to comply with the Code are not remedied within a</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>timescale set by Samsung, Samsung may suspend or terminate the contract with the Supplier.' [Supplier Code of Conduct, 01/2018: <a href="https://www.samsung.com">samsung.com</a>]</p> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Both requirement under score 1 met: See above.</li> <li>• Met: Working with ICT suppliers to improve performance: It also indicates: 'we visit [high-risk] suppliers on a regular basis to provide them with consulting services and improve their work processes.' [2019 Sustainability Report, 2019: <a href="https://www.samsung.com">samsung.com</a>]</li> </ul>
B.1.8	Approach to engagement with potentially affected stakeholders	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Stakeholder process or systems: The Company discloses information about its stakeholder engagement and communication activities by stakeholder group (including local communities, employees and suppliers). However, CHRB could not find information describing how it has identified affected or potentially affected stakeholders. [2019 Sustainability Report, 2019: <a href="https://www.samsung.com">samsung.com</a>]</li> <li>• Not met: Frequency and triggers for engagement: The information presented in its Sustainability Report 2019 includes: Key Concerns, Communication Channels and Strategy used by Stakeholder Group. However, CHRB could not find further information about frequency and triggers for engagement. As indicated below, in audits (trigger) the Company interviews suppliers employees including about their workplace environment, and takes them into account in the G-SRM. Company audits suppliers on an on-going basis. [2019 Sustainability Report, 2019: <a href="https://www.samsung.com">samsung.com</a>]</li> <li>• Met: Workers in ICT SC engaged: The Company indicates that it 'for thorough verification, we interview suppliers' employees and examine their workplace environment. We devise final improvement tasks and register them with the G-SRM' [Global Supplier Relationship Management System]. Interviews are conducted 'for the square root quantity of total employees for each supplier when conducting audits'. [2019 Sustainability Report, 2019: <a href="https://www.samsung.com">samsung.com</a>]</li> <li>• Not met: Communities in the ICT SC engaged</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Analysis of stakeholder views and company's actions on them</li> </ul>

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.1	Identifying: Processes and triggers for identifying human rights risks and impacts	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Identifying risks in own operations: In its Sustainability Report 2019, the Company states: 'We seek to continuously identify, assess and manage actual and potential human rights impacts with which we may be involved either through our own activities or as a result of our business relationships. [...] We have developed a risk analysis system in order to identify the wide range of factors that could potentially lead to adverse human rights impacts at our worksites.' The system includes the following actions: 'Monthly assessments on compliance management and improvement; Assessments on 55 items in 7 areas in 12 languages including, Chinese, Vietnamese, Spanish; Quarterly external/internal risk assessments; Analyze 57 indicators (32 internal management indicators including work environment, labor conditions, human resources operations and 25 external environmental indicators in countries where we operate); Operate in-house grievance-handling channels; Host regular discussions and interviews participating executives, managers, employee representative bodies; Engage with governments, NGOs, and academia to identify diverse risk factors and issues at global worksites.' No new relevant evidence found in last report. [Sustainability Report 2018: <a href="https://www.samsung.com">samsung.com</a>]</li> <li>• Met: Identifying risks in ICT suppliers: As indicated above, process includes identification and impacts 'with which we may be involved either through our own activities or as a result of our business relationships'. [Sustainability Report 2018: <a href="https://www.samsung.com">samsung.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Ongoing global risk identification: See above [Sustainability Report 2018: <a href="https://www.samsung.com">samsung.com</a>]</li> <li>• Met: In consultation with stakeholders: As indicated above, the process includes interviews with employee representative bodies and engagement with governments, NGOs and academia. [Sustainability Report 2018: <a href="https://www.samsung.com">samsung.com</a>]</li> <li>• Not met: In consultation with HR experts: Although process includes interviews with entities mentioned above, no further details found. [Sustainability Report 2018: <a href="https://www.samsung.com">samsung.com</a>]</li> <li>• Not met: Triggered by new circumstances</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.2	Assessing: Assessment of risks and impacts identified (salient risks and key industry risks)	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Salient risk assessment (and context): In its Sustainability Report 2018, the Company states: 'We seek to continuously identify, assess and manage actual and potential human rights impacts with which we may be involved either through our own activities or as a result of our business relationships.' The system to identify and assess human rights risks includes the following actions: 'Monthly assessments on compliance management and improvement; Assessments on 55 items in 7 areas in 12 languages including, Chinese, Vietnamese, Spanish; Quarterly external/internal risk assessments; Analyze 57 indicators (32 internal management indicators including work environment, labor conditions, human resources operations and 25 external environmental indicators in countries where we operate); Operate in-house grievance-handling channels; Host regular discussions and interviews participating executives, managers, employee representative bodies; Engage with governments, NGOs, and academia to identify diverse risk factors and issues at global worksites.' No new relevant evidence found in last report. [Sustainability Report 2018: <a href="https://www.samsung.com">samsung.com</a>]</li> <li>• Not met: Public disclosure of salient risks: The Company states that it 'identified key vulnerable groups to non-exhaustively include children, apprentices, and migrant workers, who are at heightened risk for adverse human rights impacts. Consequently, we have dedicated special care and attention to these particular groups.' However, the information about its salient human rights issues is incomplete, it speaks about groups of individuals but not about human rights issues. [Sustainability Report 2018: <a href="https://www.samsung.com">samsung.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> </ul>
B.2.3	Integrating and Acting: Integrating assessment findings internally and taking appropriate action	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Action Plans to mitigate risks</li> <li>• Not met: Including in ICT supply chain</li> <li>• Met: Example of Actions decided: The Company states in its Sustainability Report 2019: 'Migrant workers are often vulnerable to the risk of forced, bonded, or indentured labor as well as human trafficking as they are seeking economic opportunities outside their own country due to unstable political or economic situation in their home countries. In 2018, we conducted an investigation of all our first-tier suppliers located in Malaysia. We took an especially closer look at recruitment fees and identification documents. After the inspections, we provided education for the entire suppliers' management and working groups to avoid recurrence of similar issues and to protect migrant workers.' [2019 Sustainability Report, 2019: <a href="https://www.samsung.com">samsung.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> </ul>
B.2.4	Tracking: Monitoring and evaluating the effectiveness of actions to respond to 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: System to check if Actions are effective</li> <li>• Not met: Lessons learnt from checking effectiveness: The Company discloses some information about its Stakeholder Engagement Forum, it was aimed 'To actively communicate and engage with our stakeholders, we held a stakeholder engagement forum in Vietnam with approximately 300 stakeholders. Under the topic of "Gender Equality and Integration in the Digital Era", we invited the Vietnam General Confederation of Labour, the International Labour Organization (ILO), UN Women, the World Bank, and other non-profit organizations, to present and held panel discussions. The forum enabled us to gather meaningful perspectives from all relevant stakeholders on how to enhance human rights as a member of the global community and an industry leader.' However, no evidence found about specific lessons learnt from checking the effectiveness of actions implemented. [2019 Sustainability Report, 2019: <a href="https://www.samsung.com">samsung.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both requirement under score 1 met</li> </ul>
B.2.5	Communicating : Accounting for how human rights impacts are addressed	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Comms plan re identifying risks: See indicator B.2.1</li> <li>• Not met: Comms plan re assessing risks: See indicator B.2.2. Although the Company describes a system to assess human rights risks and impacts, no specific evidence found on a description on which are its salient issues.</li> <li>• Not met: Comms plan re action plans for risks: See indicator B.2.3</li> <li>• Not met: Comms plan re reviewing action plans</li> <li>• Not met: Including ICT suppliers</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			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	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Channel accessible to all workers: In its Business Conduct Guidelines, the Company states that it 'has dedicated channels through which our employees can report violations of 'Business Conduct Guidelines'. Employees may call, send a fax or submit an online report on the Ethical Management website. The website is accessible in 14 languages across 67 different websites, and reports are handled discreetly.' [Business Conduct Guidelines 2016, 2016: <a href="https://www.samsung.com">samsung.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Number grievances filed, addressed or resolved: The Company indicates in its Sustainability Report 2019 that 'In 2018, we received a total of 12,814 grievance reports, out of which 12,779 reports (99.7%) were completely resolved within our grievance handling deadline.' It also discloses the number of grievances by type of grievance, including: Labor conditions (4.467), Health and Safety (1.184), Discrimination (18) or Harassment (63). [2019 Sustainability Report, 2019: <a href="https://www.samsung.com">samsung.com</a>]</li> <li>• Met: Channel is available in all appropriate languages: See above. [Business Conduct Guidelines 2016, 2016: <a href="https://www.samsung.com">samsung.com</a>]</li> <li>• Met: Expect ICT supplier to have equivalent grievance systems: In its Supplier Code of Conduct, the Company indicates: 'The Supplier shall establish and continue to operate at all times processes, including an effective grievance mechanism to assess employees' understanding of and obtain feedback on violations against practices and conditions covered by this Code and to foster continuous improvement.' In addition, the Company indicates in its Supplier Code of Conduct that 'All Suppliers shall adhere to the Code and ensure all of their direct or indirect sub-suppliers related to assembly, components, raw materials and packaging comply with the Code.' [Supplier Code of Conduct, 01/2018: <a href="https://www.samsung.com">samsung.com</a>]</li> <li>• Met: Opens own system to ICT supplier workers: The Company indicates in its Sustainability Report 2018 that it has 'been operating a hotline system since 2013 to gather reports on violations of the working environment standards or infringements on human rights within our suppliers' worksites. Such reports are submitted via landline, e-mail, or mobile platform and are reviewed by respective departments for verification at Samsung Electronics.' [2019 Sustainability Report, 2019: <a href="https://www.samsung.com">samsung.com</a>]</li> </ul>
C.2	Grievance channel(s)/mechanism(s) to receive complaints or concerns from external individuals and communities	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Grievance mechanism for community: In its Sustainability Report 2018, the Company states that it 'places great importance on listening to stakeholders. Providing individuals – employees and external stakeholders – with access to a grievance mechanism is not only a key part of our commitment to respecting human rights, but also an important source of information for us about potential adverse human rights impacts [...] We also provide employees and other stakeholders with access to complaints or grievance mechanisms in various formats'. In addition, in its 2019 Sustainability Report, the Company states that 'in 2018, we established an additional grievance handling channel (civilsociety@samsung.com) to listen to various voices of stakeholders. [...] In particular, our workplaces employing migrant workers provide information on grievance resolution channels in their native languages to enhance their accessibility'. [Sustainability Report 2018: <a href="https://www.samsung.com">samsung.com</a> &amp; 2019 Sustainability Report, 2019: <a href="https://www.samsung.com">samsung.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Describes accessibility and local languages</li> <li>• Not met: Expects ICT supplier to have community grievance systems</li> <li>• Met: ICT supplier communities use global system: As indicated above, the Company indicates that it 'places great importance on listening to stakeholders. Providing individuals – employees and external stakeholders – with access to a grievance mechanism is not only a key part of our commitment to respecting human rights, but also an important source of information for us about potential adverse human rights impacts [...] We also provide employees and other stakeholders with access to complaints or grievance mechanisms in various formats'. [2019 Sustainability Report, 2019: <a href="https://www.samsung.com">samsung.com</a> &amp; Sustainability Report 2018: <a href="https://www.samsung.com">samsung.com</a>]</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: ICT suppliers consult users in creation or assessment</li> </ul>
C.4	Procedures related to the mechanism(s)/channel(s) are publicly available and explained	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Met: Response timescales: In its Sustainability Report 2019, the Company indicates that 'we have been operating a hotline system since 2013 to gather reports on violations of the working environment standards or infringements on human rights within our suppliers' worksites. Such reports are submitted via landline, e-mail, or mobile platform and are reviewed by respective departments for verification at Samsung Electronics. Then, those who raised the issues are notified of the corrective actions to be taken within one week, followed by a review of whether suppliers have taken corrective actions.' The Company also indicates that its grievance mechanisms are open to other stakeholders (See indicator C.2). [2019 Sustainability Report, 2019: <a href="https://www.samsung.com">samsung.com</a>]</li> <li>• Not met: How complainants will be informed</li> <li>• Not met: Who is handling the complaint</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Escalation to senior/independent level</li> </ul>
C.5	Commitment to non-retaliation over complaints or concerns made	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Public statement prohibiting retaliation: The Company states that it 'does not, under any circumstance, tolerate retaliation against any employee who makes a good faith report and/or refuses to partake in acts in violation of these guidelines.' However, the provision is not extended to other stakeholders. [Business Conduct Guidelines 2016, 2016: <a href="https://www.samsung.com">samsung.com</a>]</li> <li>• Met: Practical measures to prevent retaliation: The Company 'guarantees the anonymity of employees using the grievance resolution channel and the secrecy of the information collected through the channel.', according to its Business Code Guidelines. [Business Conduct Guidelines 2016, 2016: <a href="https://www.samsung.com">samsung.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Has not retaliated in practice</li> <li>• Not met: Expects ICT suppliers to prohibit retaliation: In its Supplier Code of Conduct, the Company indicates: 'Programs that ensure the confidentiality and protection of supplier and employee whistleblower are to be maintained unless prohibited by law. Suppliers should have a communicated process for their personnel to be able to raise any concerns without fear of retaliation.' However, there is no a direct provision to prohibit retaliation and whether it is extensive to suppliers' external stakeholders. [Supplier Code of Conduct, 01/2018: <a href="https://www.samsung.com">samsung.com</a>]</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	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Met: Says how it would remedy key sector risks: The Company sets out its Child Labor Remediation Program in its Child Labor Prohibition Policy in China, which includes, among other actions, the following: 'When programs which serve the best interests of the Child Laborer are available and when the Child Laborer and his/her family agree to let him/her go to school, Samsung shall provide adequate financial support to enable the Child Laborer to attend and remain in school until the age of 16. Samsung shall ensure that the Child Laborer continues to receive educational and living expenses which are equivalent to the local legal minimum wage while enrolled in school. [...] When there is no better option for the Child Laborer other than sending him/her back home, Samsung shall fully cover the transportation cost of sending the Child Laborer back to his/her family or original place of residence. When the Child Laborer reaches the legal minimum working age, he/she must be</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>given the opportunity to be re-employed by Samsung. Wages and other benefits for the Child Laborer, now above the legal working age, shall be equal to or higher than the level which he/she was paid before'. [Child Labor Prohibition Policy in China, 06/2014: <a href="http://samsung.com">samsung.com</a>]</p> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Changes introduced to stop repetition</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.4.1.a	Living wage (in own production or manufacturing operations)	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Living wage target timeframe: In its Sustainability Report 2018, the Company states that it 'strongly supports the concept of a living wage.' However, there is no further information stating that the Company pays living wages to all workers or has a target timeframe. In its Business Conduct Guidelines the Company indicates: 'Wages are determined reasonably and fairly in accordance with relevant laws and standards'. No new relevant evidence found in last report. [Sustainability Report 2018: <a href="http://samsung.com">samsung.com</a> &amp; Business Conduct Guidelines 2016, 2016: <a href="http://samsung.com">samsung.com</a>]</li> <li>• Met: Describes how living wage determined: In its Sustainability Report, the Company indicates: 'We define a living wage as the income necessary for a worker and their family to meet basic needs. [...] We used the recognized Richard Anker and Martha Anker's methodology to calculate the amount of living wage.' No new relevant evidence found in last report. [Sustainability Report 2018: <a href="http://samsung.com">samsung.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Achieved payment of living wage</li> <li>• Not met: Regularly review definition of living wage with unions: In addition, it states: 'After calculating the amounts in various countries, we are carefully considering engagement with relevant global initiatives and setting up management systems to remain up to date and to reflect global perspectives on the living wage in our wage policies.' However, it is not clear whether it has already implemented the management system, including the involvement of trade unions. No new relevant evidence found in last report. [Sustainability Report 2018: <a href="http://samsung.com">samsung.com</a>]</li> </ul>
D.4.1.b	Living wage (in the supply chain)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Living wage in supplier code or contracts: The Company indicates in its Supplier Code that 'Compensation paid to workers shall comply with all applicable wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits'. No evidence found on living wage. [Supplier Code of Conduct, 01/2018: <a href="http://samsung.com">samsung.com</a>]</li> <li>• Not met: Improving living wage practices of suppliers</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> <li>• Not met: Provide analysis of trends demonstrating progress</li> </ul>
D.4.2	Aligning purchasing decisions with human rights	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Avoids business model pressure on HRs</li> <li>• Met: Positive incentives to respect human rights: In its Sustainability Report 2018, the Company states: 'We perform a comprehensive annual supplier evaluation to assess the competitive edge of suppliers and to control sustainability issues by using eight evaluation criteria—Technology, Quality, Responsiveness, Delivery, Cost, EHS (Environment, Health &amp; Safety), Finance, and Law. [...] High performers are granted incentives, including the preferential transaction allocations for the following year and an opportunity to join capability building initiatives. [2019 Sustainability Report, 2019: <a href="http://samsung.com">samsung.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> </ul>
D.4.3	Mapping and disclosing the supply chain	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Identifies suppliers back to product source: The Company discloses a Supplier List which includes names and addresses of the supplier who agreed to be disclosed and represent 80% of Samsung Electronics' transaction volume. However, it is not clear whether the mapping process includes all direct and indirect suppliers. [Supplier List: <a href="http://image-us.samsung.com">image-us.samsung.com</a> &amp; Smelter List, 12/2017: <a href="http://samsung.com">samsung.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: Discloses significant parts of supply chain and why: The Company discloses a Supplier List which includes names and addresses of the supplier who agreed to be disclosed and represent 80% of Samsung Electronics' transaction volume. [Supplier List: <a href="http://image-us.samsung.com">image-us.samsung.com</a> &amp; Smelter List, 12/2017: <a href="http://samsung.com">samsung.com</a>]</li> </ul>
D.4.4.a	Prohibition on child labour: Age verification and corrective actions (in own production or manufacturing operations)	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>Met: Does not use child labour: The Company states that: 'Our policy against child labor is based on the UN Convention on the Rights of the Child, The Children's Rights and Business Principles, and ILO Convention. It requires all of our subsidiaries, as well as all of our suppliers, to comply with the policy. Accordingly, all of our subsidiaries and suppliers must comply with the strict employment process and age verification. Our policy against child labor operates under the "zero tolerance" principle, meaning that child labor at any stage of our business is unacceptable and intolerable. Our policy against child labor supports the best interest of children.' [Business Conduct Guidelines 2016, 2016: <a href="http://samsung.com">samsung.com</a>]</li> <li>Met: Age verification of job applicants and workers: See above. [Business Conduct Guidelines 2016, 2016: <a href="http://samsung.com">samsung.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>Not met: Remediation if children identified: In its Child Labor prohibition Policy in China, the Company indicates: 'When programs which serve the best interests of the Child Laborer are available and when the Child Laborer and his/her family agree to let him/her go to school, Samsung shall provide adequate financial support to enable the Child Laborer to attend and remain in school until the age of 16. Samsung shall ensure that the Child Laborer continues to receive educational and living expenses which are equivalent to the local legal minimum wage while enrolled in school. [...] When there is no better option for the Child Laborer other than sending him/her back home, Samsung shall fully cover the transportation cost of sending the Child Laborer back to his/her family or original place of residence.' However, it seems that these measures apply only in China. [Child Labor Prohibition Policy in China, 06/2014: <a href="http://samsung.com">samsung.com</a>]</li> </ul>
D.4.4.b	Prohibition on child labour: Age verification and corrective actions (in the supply chain)	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>Met: Child Labour rules in codes or contracts: Its Supplier Code includes a prohibition on using child labour. Furthermore, in its Supplier Code of Conduct Guide the Company sets out child labour requirements including age verification process and remediation programmes. [Supplier Code of Conduct, 01/2018: <a href="http://samsung.com">samsung.com</a> &amp; Supplier Code of Conduct Guide, 03/2018: <a href="http://samsung.com">samsung.com</a>]</li> <li>Not met: How working with suppliers on child labour: In its Sustainability Report 2018, the Company indicates: 'To prevent the employment of underage workers, we train our managers and the HR officers of suppliers on our recruitment process so that identity checks and face-to-face interviews are mandated for all applicants during the recruitment process. In China we supported the introduction of a facial recognition system in 2014 to prevent the employment of underage workers through identity theft.' However, it is not clear if the system was implemented in suppliers or in its own operation facilities. No new relevant evidence found in last report. [Sustainability Report 2018: <a href="http://samsung.com">samsung.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 demonstrating progress</li> </ul>
D.4.5.a	Prohibition on forced labour: Debt bondage and other unacceptable financial costs (in own production or manufacturing operations)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>Not met: Pays workers in full and on time: In its Migrant Worker Guidelines the Company indicates: '[...] any recruitment or placement fees imposed on migrant workers by recruiting agencies, sub-agents, or third parties are strongly prohibited during recruitment process. [...] The payment of wages shall be credited to the bank account of the migrant worker no later than designated date of the following month [...].' However, it is not clear if these Guidelines are also applied for the rest of its workers. [Migrant Worker Guidelines, 12/2016: <a href="http://samsung.com">samsung.com</a>]</li> <li>Not met: Payslips show any legitimate deductions: In addition, it indicates: Samsung shall provide a wage statement in the migrant worker's native language with an explanation of the basis on which they are compensated including wage, bonuses, deductions, and other components if any.' However, it is not clear if these Guidelines are also applied for the rest of its workers. [Migrant Worker Guidelines, 12/2016: <a href="http://samsung.com">samsung.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> <li>Not met: How these practices are implemented and monitored for agencies, labour brokers or recruiters: Finally, it states: 'Samsung shall also periodically conduct appropriate due diligence, monitoring, and training programs to screen and manage Samsung's suppliers and recruitment agencies.' However, it is not clear if these Guidelines are also applied for the rest of its workers. [Migrant Worker Guidelines, 12/2016: <a href="https://www.samsung.com">samsung.com</a>]</li> </ul>
D.4.5.b	Prohibition on forced labour: Debt bondage and other unacceptable financial costs (in the supply chain)	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>Met: Debt and fees rules in codes or contracts: In its Supplier Code of Conduct, the Company indicates: 'Forced, bonded (including debt bonded) or indentured labor; prison labor; or slavery or trafficking of persons shall not be used. Workers shall not be required to pay for their employment. Suppliers shall maintain adequate controls to ensure that workers have not been charged recruitment or placement fees during their recruitment process and Suppliers are responsible to repay any such fees charged to workers'. [Supplier Code of Conduct, 01/2018: <a href="https://www.samsung.com">samsung.com</a>]</li> <li>Met: How working with suppliers on debt &amp; fees: In its Migrant Worker Guidelines, the Company states: 'Samsung shall also periodically conduct appropriate due diligence, monitoring, and training programs to screen and manage Samsung's suppliers and recruitment agencies. In addition, the Company indicates that ' In 2018, we conducted an investigation of all our first-tier suppliers located in Malaysia. We took an especially closer look at recruitment fees and identification documents. After the inspections, we provided education for the entire suppliers' management and working groups to avoid recurrence of similar issues and to protect migrant workers. Regarding the problems identified in some suppliers, we will formulate improvement measures through root cause analysis and we will make continuous efforts to improve the working environment for migrant workers'. [Migrant Worker Guidelines, 12/2016: <a href="https://www.samsung.com">samsung.com</a> &amp; 2019 Sustainability Report, 2019: <a href="https://www.samsung.com">samsung.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>Met: Both requirements under score 1 met</li> <li>Not met: Provide analysis of trends in progress made</li> </ul>
D.4.5.c	Prohibition on forced labour: Restrictions on workers (in own production or manufacturing operations)	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>Met: Does not retain documents or restrict movement: In its Migrant Worker Guidelines, the Company indicates: 'Samsung shall not hold original migrant worker identification documents such as passport, government-issued identification, and other personal documents. [...] There shall be no unreasonable restrictions on migrant workers' freedom of movement in the facilities or accommodations, and excessive facility entry and exit restrictions shall not be imposed, except where necessary for worker safety.' [Migrant Worker Guidelines, 12/2016: <a href="https://www.samsung.com">samsung.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>Not met: How sure about agencies or brokers: In addition, it states: 'Samsung shall also periodically conduct appropriate due diligence, monitoring, and training programs to screen and manage Samsung's suppliers and recruitment agencies.' However, it is not clear whether the Company already started the monitoring and training programs. [Migrant Worker Guidelines, 12/2016: <a href="https://www.samsung.com">samsung.com</a>]</li> </ul>
D.4.5.d	Prohibition on forced labour: Restrictions on workers (in the supply chain)	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>Met: Free movement rules in codes or contracts: In its Supplier Code, the Company indicates: 'Workers must not be required to surrender any government-issued identification, passports, or work permits as a condition of employment.' In addition, in its Supplier Code of Conduct Guide, the Company indicates: '[...]there shall be no unreasonable restrictions on the movement of workers such as toilets, drinking water, external medical facilities, factory/dormitory exit and entry. [Supplier Code of Conduct, 01/2018: <a href="https://www.samsung.com">samsung.com</a> &amp; Supplier Code of Conduct Guide, 03/2018: <a href="https://www.samsung.com">samsung.com</a>]</li> </ul> <ul style="list-style-type: none"> <li>Not met: How these practices are implemented and monitored for agencies, labour brokers or recruiters</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>Not met: Both requirements under score 1 met</li> <li>Not met: Provide analysis of trends in progress made</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.4.6.a	Freedom of association and collective bargaining (in own production or manufacturing operations)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Commits not to interfere with union rights and collective bargaining and prohibits intimidation and retaliation: In its Business Code of Conduct Guidelines, the Company states: 'Our objective is to maintain and develop a mutually cooperative and coexisting employer-employee relationship based on faith and trust. To this end, we recognize and respect our employees' right to freedom of association in accordance with local laws.' However, there is no mention to 'collective bargaining' and to a provision to prohibit any form of intimidation, harassment or retaliation against workers seeking to exercise these rights. [Business Conduct Guidelines 2016, 2016: <a href="https://www.samsung.com">samsung.com</a>]</li> <li>• Not met: Discloses % covered by collective bargaining: In its Sustainability Report 2019, the Company indicates: 'we operate work councils in 48 global workplaces in accordance with the country's laws and regulations as well as based on each business site's characteristics. [...] In 2018, 1,180 discussions were held and joined by a total of 17,256 employees.' However, there is no further information about the proportion of workers covered by a collective bargaining agreements. [2019 Sustainability Report, 2019: <a href="https://www.samsung.com">samsung.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both requirement under score 1 met</li> </ul>
D.4.6.b	Freedom of association and collective bargaining (in the supply chain)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: FoA &amp; CB rules in codes or contracts: In its Supplier Code of Conduct, the Company indicates: 'In conformance with local law, Suppliers shall respect the right of all workers to form and join worker council or trade unions of their own choosing, to bargain collectively and to engage in peaceful assembly as well as respect the right of workers to refrain from such activities. Workers and/or their representatives shall be able to openly communicate and share ideas and concerns with management regarding working conditions and management practices without fear of discrimination, reprisal, intimidation or harassment.' However, it is not clear whether the Company is requiring to respecting those rights in all contexts, as it indicates 'in conformance with local law'. [Supplier Code of Conduct, 01/2018: <a href="https://www.samsung.com">samsung.com</a>]</li> <li>• Not met: How working with suppliers on FoA and CB</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> <li>• Not met: Provide analysis of trends in progress made</li> </ul>
D.4.7.a	Health and safety: Fatalities, lost days, injury rates (in own production of manufacturing operations)	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Injury Rate disclosures: In its Sustainability Report 2019, the Company discloses information about its injury rate and frequency rate. The health and safety indicators are based on all domestic employees and employees at the overseas manufacturing subsidiaries. [2019 Sustainability Report, 2019: <a href="https://www.samsung.com">samsung.com</a>]</li> <li>• Met: Lost days or near miss disclosure: See above. [2019 Sustainability Report, 2019: <a href="https://www.samsung.com">samsung.com</a>]</li> <li>• Not met: Fatalities disclosures</li> <li>• Not met: Occupational disease rates</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Set targets for H&amp;S performance: In addition, the Company indicates: 'Through continued investment on safety programs and initiatives, and by maintaining a rigorous safety-first culture, we aim to reach a zero rate of workplace injuries.' No new relevant evidence found in last report. [Sustainability Report 2018: <a href="https://www.samsung.com">samsung.com</a>]</li> <li>• Not met: Met targets or explains why not</li> </ul>
D.4.7.b	Health and safety: Fatalities, lost days, injury rates (in the supply chain)	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Sets out clear Health and Safety requirements: Its Supplier Code of Conduct and Supplier Code of Conduct Guide set out clear health and safety requirements, including the ones related to: Occupational Safety, Emergency Preparedness, Occupational Injury and Illness, Industrial Hygiene, Physically Demanding Work, Machine Safeguarding, Sanitation, Food and Housing and Health and Safety Communication. [Supplier Code of Conduct, 01/2018: <a href="https://www.samsung.com">samsung.com</a> &amp; Supplier Code of Conduct Guide, 03/2018: <a href="https://www.samsung.com">samsung.com</a>]</li> <li>• Not met: Injury rate disclosures: The Company discloses information about its injury rate and frequency rate, but these figures do not take into account the workers at suppliers. [2019 Sustainability Report, 2019: <a href="https://www.samsung.com">samsung.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Not met: Lost days or near miss disclosures: See above [2019 Sustainability Report, 2019: <a href="https://www.samsung.com">samsung.com</a>]</li> <li>• Not met: Fatalities disclosures</li> <li>• Not met: Occupational disease rates</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: How working with suppliers on H&amp;S: In its Sustainability Report 2019, the Company indicates: 'we have engaged in numerous improvement activities such as "EHS Innovation Day", an event held to spread a culture of safety, and EHS consulting for our suppliers.'</li> </ul> <p>In addition, the Company disclosed information about its 'Partner Safety Group in its Sustainability Report 2018: 'In 2014, we created an independent organization, 'Partner Safety Group,' in charge of supporting the EHS management of our suppliers. Through this group, we transfer our expertise and educational programs to assist key suppliers improve EHS standards.' Its works with its suppliers to improve their practices through: Audits and Consulting on Corrective Actions, Training and Sharing and Dissemination. [Sustainability Report 2018: <a href="https://www.samsung.com">samsung.com</a> &amp; 2019 Sustainability Report, 2019: <a href="https://www.samsung.com">samsung.com</a>]</p> <ul style="list-style-type: none"> <li>• Not met: Provide analysis of trends in progress made</li> </ul>
D.4.8.a	Women's rights (in own production or manufacturing operations)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Process to stop harassment and violence: The Company has developed a Guidelines on Prevention of Harassment. However, these Guidelines refer do not include specific measures related to women. [Guidelines on the Prevention of Harassment, 08/2018: <a href="https://www.image-us.samsung.com">image-us.samsung.com</a>]</li> <li>• Not met: Working conditions take account of gender: In its Sustainability Report 2018, the Company indicates: 'We also created various educational programs and invested in facilities for pregnant women.' However, there is no further information about these programs. No new relevant evidence found in last report. [Sustainability Report 2018: <a href="https://www.samsung.com">samsung.com</a>]</li> <li>• Not met: Equality of opportunity at all levels: In its Business Conduct Guidelines, the Company states: 'We do not discriminate on the basis of gender, skin color, race, ethnicity, nationality, religion, age, marital status, sexual preference, sexual identity, social status, disability, pregnancy, military status, protected genetic information, or political affiliation in all processes such as work, promotion, compensation and disciplinary measures.' However, CHRB could not find further information describing how the Company monitors and maintain its policy throughout all levels of employment. [Business Conduct Guidelines 2016, 2016: <a href="https://www.samsung.com">samsung.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Meets all of the requirements under score 1</li> </ul>
D.4.8.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"> <li>• Not met: Women's rights in codes or contracts: In its Supplier Code of Conduct, the Company indicates: 'Reasonable steps must also be taken to remove pregnant women/nursing mothers from working condition with high hazards, remove or reduce any workplace health and safety risks to pregnant women and nursing mothers including those associated with their work assignments, and include reasonable accommodations for nursing mothers.' However, CHRB could not find requirements of equal pay for equal work or to ensure equal opportunities throughout all levels of employment. [Supplier Code of Conduct, 01/2018: <a href="https://www.samsung.com">samsung.com</a> &amp; Supplier Code of Conduct Guide, 03/2018: <a href="https://www.samsung.com">samsung.com</a>]</li> <li>• Not met: How working with suppliers on women's rights</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both requirement under score 1 met</li> <li>• Not met: Provide analysis of trends in progress made</li> </ul>
D.4.9.a	Working hours (in own production or manufacturing operations)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Respects max hours, min breaks and rest periods in its own operations: In its Business Conduct Guidelines, the Company states: 'Working hours are decided according to the characteristics of each work area and the related regulations in each country.' However, there is no mention to international standards. [Business Conduct Guidelines 2016, 2016: <a href="https://www.samsung.com">samsung.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: How it implements and checks this</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.4.9.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: In its Supplier Code of Conduct, the Company indicates: 'Working hours are not to exceed the maximum set by local law. Further, a workweek should not be more than 60 hours per week, including overtime, except in emergency or unusual situations. Workers shall be allowed at least one day off every seven days.' However, no evidence found of references to international standards, standard weekly hours. In addition, it not clear what 'exceptional or unusual situations' would be. [Supplier Code of Conduct, 01/2018: <a href="https://www.samsung.com">samsung.com</a>]</li> <li>• Not met: How working with suppliers on working hours</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> <li>• Not met: Provide analysis of trends in progress made</li> </ul>
D.4.10.a	Responsible Mineral Sourcing: Arrangements with Suppliers and Smelters/Refiners in the Mineral Resource Supply Chains	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Responsible mineral sourcing due diligence in supplier contracts: In its Supplier Code of Conduct, the Company states: 'Suppliers, at any rate, shall not use minerals (such as tantalum, tungsten, tin, gold, cobalt, etc.) and illegally timbered raw materials from any area, where it can cause serious human rights abuses and environmental destruction in the international community. [...] Furthermore, Suppliers shall exercise due diligence on the source and chain of custody of these materials and make their due diligence measures available to Samsung upon Samsung's request.' In addition the Company states in the sustainability report that 'Our standard supplier contract signed with first-tier suppliers stipulates abiding by the Samsung Electronics Environmental Standard, the Samsung Electronics Supplier Code of Conduct, and international human rights standards.' However, no evidence found of requirement to OECD Guidance for conflict affected and high risk areas as part of contractual or other binding arrangements. [Supplier Code of Conduct, 01/2018: <a href="https://www.samsung.com">samsung.com</a> &amp; 2019 Sustainability Report, 2019: <a href="https://www.samsung.com">samsung.com</a>]</li> <li>• Not met: Builds capacity with smelters/refiners: The Company indicates the following: '[We] provide suppliers with guidance and systemic support on conflict minerals. [...] Additionally, we developed a management guide on conflict minerals and shared it with all of our suppliers so that they could train and educate their own employees. To raise supplier awareness about conflict minerals issues, we had conducted training sessions to 1,929 people from 1,568 suppliers by 2018, covering our conflict minerals policies, a manual on the conflict minerals management system, and information on how to become a RMAP certified smelter. After carrying out on-site inspections, we offered additional training to suppliers that needed improvement in managing conflict minerals.' However, no further details found, including capacity building in smelters and refiners. [2019 Sustainability Report, 2019: <a href="https://www.samsung.com">samsung.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Disclosure of smelter information in supplier requirements: As indicated above, the company requires in the supplier code of conduct that suppliers 'make their due diligence measures available to Samsung upon Samsung's request'. It also adds that 'Our standard supplier contract signed with first-tier suppliers stipulates abiding by the Samsung Electronics Environmental Standard, the Samsung Electronics Supplier Code of Conduct, and international human rights standards'. [Supplier Code of Conduct, 01/2018: <a href="https://www.samsung.com">samsung.com</a> &amp; 2019 Sustainability Report, 2019: <a href="https://www.samsung.com">samsung.com</a>]</li> <li>• Met: Responsible conflict mineral sourcing covers all minerals: The Company's Supplier Code requires to its suppliers to not use minerals and illegally timbered raw materials from any area, where it can cause serious human rights abuses. Commitment for supply chain seems to cover minerals in general. [Supplier Code of Conduct, 01/2018: <a href="https://www.samsung.com">samsung.com</a>]</li> </ul>
D.4.10.b	Responsible Mineral Sourcing: Risk Identification in Mineral Supply Chain	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Risk identification and disclosure in line with OECD Guidance: In its Policy to Responsible Sourcing, the Company states that the minerals used in its products meet the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas. However, CHRB could not find information about its process for identifying and prioritising risks and impacts related to the sourcing of minerals in its supply chain or for identify smelters/refiners, and disclosing these risks. [Policy to Responsible Sourcing: <a href="https://www.samsung.com">samsung.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Met: Identification of smelter/refiners and OECD due diligence: The Company indicates that 'we also conduct regular audits into the use of conflict minerals throughout the supply chain by reviewing information submitted by suppliers, and conducting on-site audits of companies whose systems require additional verification. We encourage suppliers to partner with smelters certified by the RMAP and require uncertified smelters in our supply chain to become certified by the RMAP. This resulted in participation of all smelters we do business with in the RMAP certification, and 98% of smelters completed the certification. We will continue to endeavor to make all 100% smelters complete the RMAP certification. [Policy to Responsible Sourcing: <a href="https://www.samsung.com">samsung.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Met: Discloses smelters/refiners judged in line with OECD due diligence: The Company discloses a Smelter and Refiner List, which include information about RMAP Status (Conformant or Active). [Smelter List, 12/2017: <a href="https://www.samsung.com">samsung.com</a>]</li> <li>• Not met: Responsible conflict mineral sourcing covers all minerals</li> </ul>
D.4.10.c	Responsible Mineral Sourcing: Risk Management in the Mineral 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: Describes mineral risk management plan for supply chain</li> <li>• Not met: Monitoring, tracking and whether better risk prevention/mitigation over time</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Supplier and stakeholders engaged in risk management strategy</li> <li>• Not met: Responsible conflict mineral sourcing covers all minerals</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		<ul style="list-style-type: none"> <li>• Headline: Samsung and Panasonic accused of labour abuses in supply chain in Malaysia</li> <li>• Area: Forced labour - retaining ID papers</li> <li>• Story: In November 2016, The Guardian published a report accusing Samsung and Panasonic of letting Nepalese workers being duped, exploited and underpaid in their supply chain in Malaysia. According to the British newspaper, the Nepalese workers stated that they had not been paid, that they have had their passports confiscated and that they had been told to pay large fines if they wanted to return to Nepal before the end of their contract. Workers also claimed that they were forced to work up to 14 hours standing on their feet without adequate rest, and with restricted toilet breaks. In addition, they were asked to pay GBP 1,000 as a recruitment fee to secure jobs. The two companies have launched investigations into the allegation.</li> <li>• Sources: [The guardian, 21/11/2016: <a href="https://www.theguardian.com">theguardian.com</a>][Malaymail online, 21/11/2016: <a href="https://www.malaymail.com">malaymail.com</a>][The guardian, 21/11/2016: <a href="https://www.theguardian.com">theguardian.com</a>]</li> </ul>
E(1).1	The Company has responded publicly to the allegation	2	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Met: Public response available: Both Samsung and Panasonic have said they are opening investigations into the conduct of their suppliers following the claims. Additionally, Samsung provides a detailed response, part of which states, "In the context of a media report on the working conditions of migrant workers in labor supply companies, Samsung Electronics conducted an on-site investigation of these companies we work with in Malaysia and the migrant workers hired by these companies. Based on this investigation, we identified one of our labor supply companies to be in violation of the hiring process of migrant workers, and as consequence, we terminated our contract with this company. The remaining labor supply companies are under investigation." [The Guardian article on supply chain working conditions in Malaysia, 2016: <a href="https://www.theguardian.com">theguardian.com</a> &amp; Statement on Introduction of the Samsung Migrant Worker Guidelines, 12/12/16: <a href="https://www.news.samsung.com">news.samsung.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Met: Response goes into detail: Samsung reports in detail about the action that was taken following media reports of poor working conditions in its Malaysia supply chain. These included the termination of one of its labour supply companies, as well as the establishment of new 'Migrant Worker Guidelines. [Statement on Introduction of the Samsung Migrant Worker Guidelines, 12/12/16: <a href="https://www.news.samsung.com">news.samsung.com</a>]</li> </ul>
E(1).2	The Company has appropriate policies in place	2	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Met: Company policies address the general issues raised: The Company states that " Samsung strongly supports the right of voluntary labor and is committed to banning participation in, or imposition of, forced labor by means of mental or</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>physical bondage in accordance with the California Transparency in Supply Chains Act and the UK Modern Slavery Act. Samsung ensures that its suppliers do not in any way support the illegal activity of slave labor and human trafficking.” [Business Conduct Guidelines 2016, 2016: <a href="http://samsung.com">samsung.com</a>]</p> <ul style="list-style-type: none"> <li>• Met: Policies apply to the type of business relationships involved: The policy also applies to the Company’s business partners. [Samsung ElectronicsSupplier Code of Conduct, 2017: <a href="http://samsung.com">samsung.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Policies address the specific rights in question: The Company states that “Workers must not be required to surrender any government-issued identification, passports, or work permits as a condition of employment. Suppliers or labor dispatch agencies shall not receive deposits or fees (e.g. recruitment or hiring fees) from workers. “ [Samsung ElectronicsSupplier Code of Conduct, 2017: <a href="http://samsung.com">samsung.com</a>]</li> </ul>
E(1).3	The Company has taken appropriate action	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Engages with affected stakeholders: In its statement about the migrant worker guidelines and the allegations of poor labour conditions in Malaysia, the company says "To take action to prevent any similar issues, we are introducing our new Samsung Migrant Worker Guidelines, which we have been developing with advice from the NGO, Business for Social Responsibility (BSR), effective as of today, December 12, 2016". However this is not sufficient evidence of engagement with the affected stakeholders migrant (workers) [Statement on Introduction of the Samsung Migrant Worker Guidelines, 12/12/16: <a href="http://news.samsung.com">news.samsung.com</a>]</li> <li>• Met: Encourages linked business to engage affected stakeholders: The company said that based on its investigation into poor labour standards in Malaysia, "We identified one of our labor supply companies to be in violation of the hiring process of migrant workers, and as consequence, we terminated our contract with this company. The remaining labor supply companies are under investigation". [Statement on Introduction of the Samsung Migrant Worker Guidelines, 12/12/16: <a href="http://news.samsung.com">news.samsung.com</a>]</li> <li>• Not met: Provides remedies to affected stakeholders: CHRB did not find evidence of the Company providing remedies to the affected workers.</li> <li>• Met: Has reviewed management systems to prevent recurrence: The company said "Samsung Electronics conducted an on-site investigation of these companies we work with in Malaysia and the migrant workers hired by these companies. Based on this investigation, we identified one of our labor supply companies to be in violation of the hiring process of migrant workers, and as consequence, we terminated our contract with this company. The remaining labor supply companies are under investigation". Additionally the introduction of the Migrant Worker Guidelines is evidence of the company having reviewed its management system. [Statement on Introduction of the Samsung Migrant Worker Guidelines, 12/12/16: <a href="http://news.samsung.com">news.samsung.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Remedies are satisfactory to the victims: CHRB did not find evidence of the Company providing remedies to the affected workers, thus remedy is not satisfactory.</li> <li>• Not met: Has improved systems and engaged affected stakeholders: The Company has introduced its new guideline called ‘Samsung Migrant Worker Guidelines’ in order to prevent forced labour. However, there is no evidence of engagement with affected stakeholders. [Statement on Introduction of the Samsung Migrant Worker Guidelines, 12/12/16: <a href="http://news.samsung.com">news.samsung.com</a>]</li> </ul>
E(2).0	Serious allegation No 2		<ul style="list-style-type: none"> <li>• <b>Headline:</b> Samsung criticised by the UN and the ITUC over working rights and conditions in Vietnam</li> <li>• <b>Area:</b> Working Hours</li> <li>• <b>Story:</b> In March 2018, UN human rights experts have raised concerns about human rights violations at Samsung Vietnam.</li> </ul> <p>According to the UN statement, workers at Samsung’s Vietnamese plants raised concerns about long hours and unhealthy work conditions at the factories in Vietnam’s northern Bac Ninh and Thai Nguyen provinces, near the capital Hanoi. Women workers stated that they have been working 70 to 80 hours per week, responding to the interview conducted by human rights organisations. It is alleged that the workers were threatened and harassed by the Company after raising the concern.</p> <ul style="list-style-type: none"> <li>• Sources: [Financial Times, 21/03/2018: <a href="http://ft.com">ft.com</a>][ITUC, 21/03/2018: <a href="http://ituc-csi.org">ituc-csi.org</a>][OHCHR, 20/03/2018: <a href="http://ohchr.org">ohchr.org</a>][ituc-csi.org, 21/03/2018: <a href="http://goodelectronics.org">goodelectronics.org</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
E(2).1	The Company has responded publicly to the allegation	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Public response available: The Company stated that “We take the concerns of the UN human rights experts very seriously. We have already taken actions to investigate and will co-operate closely with relevant UN bodies and experts to clarify the matter.” [Financial Times article on working conditions in Vietnam, 21/03/18: <a href="https://www.ft.com">ft.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Response goes into detail: The Company has not published the details of the case.</li> </ul>
E(2).2	The Company has appropriate policies in place	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Company policies address the general issues raised: The Company states that “Samsung respects and protects the fundamental human rights taking into account international human rights principles and standards set forth in [...], the ILO Declaration on Fundamental Principles and Rights at Work, and the laws of the countries in which we operate.” [Business Conduct Guidelines 2016, 2016: <a href="https://www.samsung.com">samsung.com</a>]</li> <li>• Met: Policies apply to the type of business relationships involved: The policy also applies to the Company’s business partners. [Samsung Electronics Supplier Code of Conduct, 2017: <a href="https://www.samsung.com">samsung.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Policies address the specific rights in question: The Company states that “Workweeks are not to exceed the maximum set by local law. Further, a workweek shall not be more than 60 hours per week, including overtime, except in an emergency or unusual situations.” [Supplier Code of Conduct, 01/2018: <a href="https://www.samsung.com">samsung.com</a>]</li> </ul>
E(2).3	The Company has taken appropriate action	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Engages with affected stakeholders: In the company's 2019 Sustainability Report it says, "Throughout 2018 and 2019, we conducted a Human Rights Impact Assessment (HRIA) for Samsung Electronics Vietnam (SEV) in collaboration with Business for Social Responsibility (BSR), a global non-profit organization specializing in human rights... In addition, BSR's assessment included external stakeholders interviews on-site at SEV, in Vietnam, and globally, as well as an extensive document review and interview with employees and management...To actively communicate and engage with our stakeholders, we held a stakeholder engagement forum in Vietnam with approximately 300 stakeholders". These stakeholders included women's advocacy groups, and the topic was “Gender Equality and Integration in the Digital Era”. [2019 Sustainability Report, 2019]</li> <li>• Not met: Encourages linked business to engage affected stakeholders: CHR B could not find the evidence of the Company's encouraging its business partners to engage with the affected stakeholders.</li> <li>• Not met: Provides remedies to affected stakeholders: CHR B did not find evidence of the Company providing remedies to the affected women workers.</li> <li>• Met: Has reviewed management systems to prevent recurrence: The company says that in 2018-2019 "We conducted a Human Rights Impact Assessment (HRIA) for Samsung Electronics Vietnam (SEV) in collaboration with Business for Social Responsibility (BSR), a global non-profit organization specializing in human rights....We set the following goals of the HRIA for assessing SEV's human rights policy and management system: 1) identifying factors that affect human rights; 2) making recommendations to mitigate risks and maximize opportunities; and 3) improving human rights management by empowering employees and other stakeholders based on constructive dialogue". [2019 Sustainability Report, 2019]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Remedies are satisfactory to the victims: The CHR B did not find evidence of the Company providing remedies to the affected women workers.</li> <li>• Met: Has improved systems and engaged affected stakeholders: The company says it engaged with employees and management during the HRIA assessment and also hosted a stakeholder engagement forum in Vietnam, with the topic of discussion being "Gender Equality and Integration in the Digital Era". Additionally, the company says that "we are implementing various systems to improve our employees' welfare. To allow our employees to work in safer conditions, we operate in-house hospitals with a total of 93 hospital beds. We are also operating 22 Mommy Room's for expectant mother employees and in-house hospital with gynaecologists." [2019 Sustainability Report, 2019]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
E(3).0	Serious allegation No 3		<ul style="list-style-type: none"> <li>• <b>Headline:</b> Samsung Electronics' chairman and group executives indicted on charges of union sabotage</li> <li>• <b>Area:</b> FoA and CB</li> <li>• <b>Story:</b> On September 27, 2018, prosecutors from the Seoul Central District Prosecutors' Office indicted the Chairman of Samsung Electronics' board of directors, Mr. Lee Sang-hoon, along with 31 persons and entities affiliated with the Samsung Group over allegations of sabotaging unions.</li> </ul> <p>According to the prosecutors, Mr Lee led an operation to sabotage a newly formed labour union at an after-sales affiliate of the group. Mr Lee and other executives employed a vast array of tactics to hamper union activities, including threats to cut the wages of employees linked to unions and withdraw business from subcontractors who appeared union-friendly. Those union sabotages were systematically organised between 2013 and 2016.</p> <ul style="list-style-type: none"> <li>• <b>Sources:</b> [Reuters, 28/09/2018: <a href="https://www.reuters.com">reuters.com</a>][Nikkei, 28/09/2018: <a href="https://asia.nikkei.com">asia.nikkei.com</a>]</li> </ul>
E(3).1	The Company has responded publicly to the allegation	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>• <b>Not met:</b> Public response available: Regarding the chairman Lee Sang-hoon, a company spokeswoman said that "His status remains unchanged". However, there is no further information available regarding the Company's response to this case. [Reuters article on union sabotage in South Korea, 28/09/18: <a href="https://www.reuters.com">reuters.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• <b>Not met:</b> Response goes into detail</li> </ul>
E(3).2	The Company has appropriate policies in place	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• <b>Met:</b> Company policies address the general issues raised: The Company states that "Samsung respects and protects the fundamental human rights taking into account international human rights principles and standards set forth in [...], the ILO Declaration on Fundamental Principles and Rights at Work, and the laws of the countries in which we operate." [Business Conduct Guidelines 2016, 2016: <a href="https://www.samsung.com">samsung.com</a>]</li> <li>• <b>Met:</b> Policies apply to the type of business relationships involved: The policy also applies to the Company's business partners. [Samsung Electronics Supplier Code of Conduct, 2017: <a href="https://www.samsung.com">samsung.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• <b>Not met:</b> Policies address the specific rights in question: The Company does not disclose its measures to prohibit retaliation against union activities.</li> </ul>
E(3).3	The Company has taken appropriate action	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>• <b>Not met:</b> Engages with affected stakeholders: CHRB did not find the evidence of the Company's engagement with affected stakeholders.</li> <li>• <b>Not met:</b> Encourages linked business to engage affected stakeholders: CHRB could not find the evidence of the Company's encouraging its business partners to engage with the affected stakeholders.</li> <li>• <b>Not met:</b> Provides remedies to affected stakeholders: CHRB did not find evidence of the Company providing remedies.</li> <li>• <b>Not met:</b> Has reviewed management systems to prevent recurrence: CHRB did not find evidence of the Company reviewing the system followed by the case.</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• <b>Not met:</b> Remedies are satisfactory to the victims</li> <li>• <b>Not met:</b> Has improved systems and engaged affected stakeholders: CHRB did not find evidence of the Company improving the system or engaging with stakeholders followed by the case.</li> </ul>
E(4).0	Serious allegation No 4		<ul style="list-style-type: none"> <li>• <b>Headline:</b> Samsung settles with former sickened workers</li> <li>• <b>Area:</b> H&amp;S occupational disease</li> <li>• <b>Story:</b> On January 12th, 2016 Samsung signed 'a final settlement' over workers who contracted cancer in its semiconductor plants. The deal was made to improve health and safety conditions at all of Samsung's plants. Previously, an Associated Press (AP) investigation found out that South Korean authorities let Samsung withhold from sick workers and their families crucial information about the chemicals that workers were exposed in the plants. AP claimed that the Company did not disclose the information due to trade secret concerns. A worker-safety group has documented more than 200 cases of serious illnesses including leukaemia, lupus, lymphoma and multiple sclerosis among former Samsung semiconductor and LCD workers. As a result, seventy-six workers have died, most in their 20s and 30s. The Company had faced multiple legal challenges followed by the case. In addition, a Bloomberg article claimed that the miscarriage rates in the</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			production lines were significantly elevated and some toxic substances were found in some samples that were randomly taken from Samsung and SK Hynix plants. <ul style="list-style-type: none"> <li>Sources: [Pulse, 22/10/2015: <a href="http://pulsenews.co.kr">pulsenews.co.kr</a>][The Korea Times, 21/10/2015: <a href="http://koreatimes.co.kr">koreatimes.co.kr</a>][Al Jazeera, 10/8/2016: <a href="http://aljazeera.com">aljazeera.com</a>][BBC News , 11/8/2016: <a href="http://bbc.com">bbc.com</a>]</li> </ul>
E(4).1	The Company has responded publicly to the allegation	2	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Met: Public response available: The Company states that "We are very disappointed by the AP article published on August 10, which does not accurately reflect the facts of Samsung's actions. The health and safety of our employees is our number one priority and we continue to do our utmost to safeguard their wellbeing. We are committed to providing all of our employees a safe and healthy work environment in every facility we operate." [Statement on the Associated Press Article, 10/08/16: <a href="http://news.samsung.com">news.samsung.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Met: Response goes into detail: The Company states that "The claim that Samsung Electronics intentionally blocked workers from accessing chemical information pertaining to workplace health and safety, or illegally prevented the disclosure of such information, is not true. We have fully cooperated with the court and the Korea Workers' Compensation &amp; Welfare Service by transparently disclosing all chemical information required and we will continue to do so [...]" [Statement on the Associated Press Article, 10/08/16: <a href="http://news.samsung.com">news.samsung.com</a>]</li> </ul>
E(4).2	The Company has appropriate policies in place	2	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Met: Company policies address the general issues raised: The Company states that "Our highest priority is to ensure the health and safety of our employees and communities. We strive to provide a safe working environment for all Samsung employees". [Business Conduct Guidelines 2016, 2016: <a href="http://samsung.com">samsung.com</a>]</li> <li>Met: Policies apply to the type of business relationships involved: The policy also applies to the Company's business partners. [Supplier Code of Conduct, 01/2018: <a href="http://samsung.com">samsung.com</a> &amp; Business Conduct Guidelines 2016, 2016: <a href="http://samsung.com">samsung.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Met: Policies address the specific rights in question: The Company discloses the injury rates and injury frequency rate. [Sustainability Report 2017: <a href="http://samsung.com">samsung.com</a>]</li> </ul>
E(4).3	The Company has taken appropriate action	1.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Met: Engages with affected stakeholders: The Company has been engaging with the two organizations representing former employees and their families – the Family Compensation Committee and Supporters for the Health And Rights of People in the Semiconductor industry (SHARPS). [Statement on the Associated Press Article, 10/08/16: <a href="http://news.samsung.com">news.samsung.com</a>]</li> <li>Met: Provides remedies to affected stakeholders: The Company created a fund of KRW 100 billion for financial aid as well as preventive measures on workplace safety, and representatives from affected families have been participating in the financial support program. As of November, 2016, more than 160 people applied and 120 people have received financial support through the program. In addition, an Ombudsman Committee was launched in June, 2016 to carry out an overall audit of Samsung Electronics' semiconductor facilities and develop plans to improve health and safety conditions. [Employee Health and Safety at Semiconductor Facilities, 01/2016: <a href="http://news.samsung.com">news.samsung.com</a>]</li> <li>Met: Has reviewed management systems to prevent recurrence: An Ombudsman Committee was launched in June, 2016 to carry out an overall audit of Samsung Electronics' semiconductor facilities and develop plans to improve health and safety conditions. [Employee Health and Safety at Semiconductor Facilities, 01/2016: <a href="http://news.samsung.com">news.samsung.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Not met: Remedies are satisfactory to the victims: It is not clear if the victims are satisfactory with the remedies as the Company has not sufficiently disclosed the relevant information.</li> <li>Met: Has improved systems and engaged affected stakeholders: In January, 2016, the Company reached an agreement with the Family Committee and the Supporters for the Health And Rights of People in the Semiconductor industry (SHARPS) on the mediation proposal to establish an independent, third-party Ombudsman Committee. The Ombudsman Committee was launched in June, 2016 to carry out an overall audit of Samsung Electronics' semiconductor facilities and develop plans to improve health and safety conditions. [Employee Health and Safety at Semiconductor Facilities, 01/2016: <a href="http://news.samsung.com">news.samsung.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
E(5).0	Serious allegation No 5		<ul style="list-style-type: none"> <li>• <b>Headline:</b> Samsung sued by NGOs over misleading information on working conditions</li> <li>• <b>Area:</b> Child labour</li> <li>• <b>Story:</b> Two French NGOs, Sherpa and ActionAid France announced filing a lawsuit in France against Samsung Global, and its French subsidiary, Samsung Electronics France over its misleading advertising.</li> </ul> <p>Samsung is accused of publishing misleading information on the ethical treatment of workers and working conditions, which do not reflect the reality in plants in China and South Korea. The claim is based on the research conducted by China Labor Watch who had secretly inspected several factories of the Samsung group in China and observed workers under the age of 16. The NGOs also claim that those childrens are exposed to benzene and methanol in its factories.</p> <ul style="list-style-type: none"> <li>• <b>Sources:</b> [Sherpa, 11/1/2018: <a href="http://asso-sherpa.org">asso-sherpa.org</a>][VOA news, 11/1/2018: <a href="http://voanews.com">voanews.com</a>][CNBC, 11/1/2018: <a href="http://cnbc.com">cnbc.com</a>]</li> </ul>
E(5).1	The Company has responded publicly to the allegation	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• <b>Met:</b> Public response available: The Company provided an updated response to the SHERPA lawsuit to the BHRRC, stating that "We are aware of the legal complaint against Samsung filed by SHERPA in France. We are disputing its validity, and cannot comment further on the content of the investigation since this is an ongoing proceeding. We wish to remove any ambiguity created by the word "indicted" used in recent coverage about this issue. Samsung France has been put under examination, which means that the investigation is still ongoing and that no conclusive decision has been taken regarding the allegations brought by the NGOs against the company." [Response to SHERPA allegations, 08/07/2019: <a href="http://business-humanrights.org">business-humanrights.org</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• <b>Not met:</b> Response goes into detail: The company provides significant detail on its policies used to prevent child labour, however it doesn't provide any detailed information on the allegation, on the basis that the investigation is ongoing. [Response to SHERPA allegations, 08/07/2019: <a href="http://business-humanrights.org">business-humanrights.org</a>]</li> </ul>
E(5).2	The Company has appropriate policies in place	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• <b>Met:</b> Company policies address the general issues raised: The Company states that "Our policy against child labor is based on the UN Convention on the Rights of the Child, The Children's Rights and Business Principles, and ILO Convention. It requires all of our subsidiaries, as well as all of our suppliers, to comply with the policy". [Business Conduct Guidelines 2016, 2016: <a href="http://samsung.com">samsung.com</a>]</li> <li>• <b>Met:</b> Policies apply to the type of business relationships involved: See above. [Business Conduct Guidelines 2016, 2016: <a href="http://samsung.com">samsung.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• <b>Met:</b> Policies address the specific rights in question: The Company states that " all of our subsidiaries and suppliers must comply with the strict employment process and age verification. Our policy against child labor operates under the "zero tolerance" principle, meaning that child labor at any stage of our business is unacceptable and intolerable. Our policy against child labor supports the best interest of children." [Business Conduct Guidelines 2016, 2016: <a href="http://samsung.com">samsung.com</a>]</li> </ul>
E(5).3	The Company has taken appropriate action	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• <b>Not met:</b> Engages with affected stakeholders: CHRB did not find the evidence of the Company's engagement with affected stakeholders other than through the court case.</li> <li>• <b>Not met:</b> Provides remedies to affected stakeholders: CHRB did not find evidence of the Company providing remedies to the affected workers.</li> <li>• <b>Met:</b> Has reviewed management systems to prevent recurrence: In the company's recent response to the SHERPA investigation, it outlines all the steps it has taken to combat child labour in its supply chain, "Samsung upholds a zero tolerance policy on child labor - both in our own facilities and the facilities of our suppliers...In this regard, we publicly announced our Child Labor Prohibition Policy in China in 2014. The policy was co-developed with Centre for Child Rights and Corporate Social Responsibility (CCR CSR) in China, which is owned by Save the Children Sweden...As part of our pledge against underage employment, we oblige all our suppliers in China to comply with hiring policies which require mandatory face-to-face interviews of all candidates and usage of an electronic device to detect fake IDs...In addition to those efforts, we have been reviewing the status of our use of cobalt according to OECD Due Diligence Guidance in Democratic Republic of the Congo. As such, we have been investigating all cobalt smelters related to our company. We will continue to set clear guidelines for our suppliers</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>and raise their awareness about responsible sourcing of minerals through educational training". [Samsung Electronic's response to concerns regarding child labour in Chinese factories, 11/2014: <a href="http://business-humanrights.org">business-humanrights.org</a> &amp; Response to SHERPA allegations, 08/07/2019: <a href="http://business-humanrights.org">business-humanrights.org</a>]</p> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Remedies are satisfactory to the victims</li> <li>• Not met: Has improved systems and engaged affected stakeholders: The Company has provided evidence of reviewing its management systems and making changes such as introducing the Child Labour Prohibition Policy in China and investigating all Cobalt smelters related to the company to ensure its responsible sourcing of minerals. However, there is no evidence of the Company's engagement with stakeholders outside of the court case. [Samsung Electronic's response to concerns regarding child labour in Chinese factories, 11/2014: <a href="http://business-humanrights.org">business-humanrights.org</a> &amp; Response to SHERPA case, 2019: <a href="http://business-humanrights.org">business-humanrights.org</a>]</li> </ul>
E(6).0	Serious allegation No 6		<ul style="list-style-type: none"> <li>• Headline: Samsung facing child labour claims in its supply chain in the Democratic Republic of Congo</li> <li>• Area: Child labour</li> <li>• Story: On November 15, 2017, Amnesty International released a follow-up report regarding human rights abuses entering their cobalt supply chains amongst electronic and electric vehicle companies, including Apple.</li> </ul> <p>The report assessed the policies and practices of 29 companies and how much their cobalt-sourcing practices have improved since its previous report published in January 2016. More than half of the world's cobalt, a key element in lithium-ion batteries, is sourced from the Democratic Republic of Congo (DRC), where Amnesty has found human rights abuses. Amnesty International stated that about a fifth of the country's cobalt production is mined by informal miners including children, often in dangerous conditions. The report also claimed that children as young as seven engaged in artisanal cobalt mining. Some of these children worked in the tunnels alongside adult miners, while most helped to pick through mine tailings and wash minerals prior to sale. Many were forced to carry out this hazardous work because their families were too poor to pay school fees. Children are also being subjected to beatings and extortion by security guards and exploited by traders.</p> <p>Amnesty International pointed out that Apple has made significant progress since the 2016 report and it is leading the way in tracing cobalt used in its electronics. Apple now explicitly lists cobalt among the minerals for which it requires supplier due diligence in line with international standards.</p> <p>The electronics companies and the automobile manufacturers included in the report are: Apple, Samsung SDI, Dell, HP, BMW, Tesla, LG Chem, Sony, Samsung Electronics, General Motors, Volkswagen, Fiat-Chrysler, Daimler, Hunan, Shanshan, Amperex Technology, Tianjin Lishen, Microsoft, Lenovo, Renault, Vodafone, Huawei, L&amp;F, Tianjin B&amp;M, BYD, Coslight, Shenzhan BAK and ZTE.</p> <ul style="list-style-type: none"> <li>• Sources: [Amnesty International, 15/11/2017: <a href="http://amnesty.org">amnesty.org</a>][Reuters, 15/11/2017: <a href="http://reuters.com">reuters.com</a>]</li> </ul>
E(6).1	The Company has responded publicly to the allegation	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Public response available: The Company states that "In 2016, Amnesty International shed light on the issue of children working in cobalt mines in the Democratic Republic of Congo and demanded corporate intervention to address this issue." [Sustainability Report 2017: <a href="http://samsung.com">samsung.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Response goes into detail: The Company's response does not go into details.</li> </ul>
E(6).2	The Company has appropriate policies in place	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Company policies address the general issues raised: The Company states that "Our policy against child labor is based on the UN Convention on the Rights of the Child, The Children's Rights and Business Principles, and ILO Convention. It requires all of our subsidiaries, as well as all of our suppliers, to comply with the policy". [Business Conduct Guidelines 2016, 2016: <a href="http://samsung.com">samsung.com</a>]</li> <li>• Met: Policies apply to the type of business relationships involved: See above. [Business Conduct Guidelines 2016, 2016: <a href="http://samsung.com">samsung.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			Score 2 <ul style="list-style-type: none"> <li>• Met: Policies address the specific rights in question: The Company states that "all of our subsidiaries and suppliers must comply with the strict employment process and age verification. Our policy against child labor operates under the "zero tolerance" principle, meaning that child labor at any stage of our business is unacceptable and intolerable. Our policy against child labor supports the best interest of children." [Business Conduct Guidelines 2016, 2016: <a href="https://www.samsung.com">samsung.com</a>]</li> </ul>
E(6).3	The Company has taken appropriate action	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Engages with affected stakeholders: CHRB did not find the evidence of the Company's engagement with affected stakeholders.</li> <li>• Not met: Encourages linked business to engage affected stakeholders: CHRB could not find the evidence of the Company's encouraging its business partners to engage with the affected stakeholders.</li> <li>• Not met: Provides remedies to affected stakeholders: CHRB did not find evidence of the Company providing remedies.</li> <li>• Met: Has reviewed management systems to prevent recurrence: The Company has reviewed the system in 2014. As a result, it has added the facial recognition system to verify workers' age. [Samsung Electronic's response to concerns regarding child labour in Chinese factories, 11/2014: <a href="https://www.business-humanrights.org">business-humanrights.org</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Remedies are satisfactory to the victims</li> <li>• Not met: Has improved systems and engaged affected stakeholders: The Company has reviewed the system in 2014. As a result, it has added the facial recognition system to verify workers' age. However, CHRB did not find the evidence of the Company's engagement with affected stakeholders. [Samsung Electronic's response to concerns regarding child labour in Chinese factories, 11/2014: <a href="https://www.business-humanrights.org">business-humanrights.org</a>]</li> </ul>

## F. Transparency (10% of Total)

Indicator Code	Indicator name	Score	Explanation
F.1	Company willingness to publish information	2.77 out of 4	Out of a total of 52 indicators assessed under sections A-D of the benchmark, Samsung Electronics made data public that met one or more elements of the methodology in 36 cases, leading to a disclosure score of 2.77 out of 4 points.
F.2	Recognised Reporting Initiatives	2 out of 2	The individual elements of the assessment are met or not as follows: Score 2 <ul style="list-style-type: none"> <li>• Met: Company reports on GRI: Its Sustainability Report 2019 includes a GRI Index. [2019 Sustainability Report, 2019: <a href="https://www.samsung.com">samsung.com</a>]</li> </ul>
F.3	Key, High Quality Disclosures	0.4 out of 4	Samsung Electronics met 1 of the 10 thresholds listed below and therefore gets 0.4 out of 4 points for the high quality disclosure indicator. Specificity and use of concrete examples <ul style="list-style-type: none"> <li>• Not met: Score 2 for A.2.2 : Board discussions</li> <li>• Not met: Score 2 for B.1.6 : Monitoring and corrective actions</li> <li>• 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)  Discussing challenges openly</li> <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  Demonstrating a forward focus</li> <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.4.1.a: Living wage (in own production or manufacturing operations)</li> <li>• Not met: Score 2 for D.4.7.a: Health and safety: Fatalities, lost days, injury rates (in own production of manufacturing operations)</li> </ul>

### Disclaimer

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

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

The Benchmark is made available on the express understanding that it will be used solely for general information

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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.