

**Company Name** Alimentation Couche-Tard  
**Industry** Agricultural Products (Supply Chain only)  
**Overall Score** 3.4 out of 100

Theme Score	Out of	For Theme
0.0	10	A. Governance and Policies
0.7	25	B. Embedding Respect and Human Rights Due Diligence
2.0	20	C. Remedies and Grievance Mechanisms
0.0	25	D. Performance: Company Human Rights Practices
0.7	20	E. Performance: Responses to Serious Allegations

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 2022 Methodology document for the sector concerned. For example, a "Not met" under "General HRs Commitment", which is the first bullet point for indicator A.1.1, does not necessarily mean that the company does not have a general commitment to human rights. Rather, it means that the CHRB could not identify a public statement of policy in which the company commits to respecting human rights.

## Detailed assessment

### A. Governance and Policies (10% of Total)

#### A.1 Policy Commitments (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1.1	Commitment to respect human rights	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: General HRs commitment: The Company states in its Ethics Code of Conduct: 'We expect our suppliers and partners to act according to ethical standards that are consistent with our values and our sustainability vision'. However, no statement where the Company commits to respect human rights was found in a suitable source for policy statement according to CHRB's revised approach. [Ethics Code of Conduct, 10/2021: <a href="https://www.corpo.couche-tard.com">corpo.couche-tard.com</a>]</li> <li>• Not Met: Universal Declaration of Human rights (UDHR)</li> <li>• Not Met: International Bill of Human Rights</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Commitment to the UNGPs</li> <li>• Not Met: Commitment to the OECD Guidelines for Multinational Enterprises</li> </ul>
A.1.2.a	Commitment to respect the human rights of workers: ILO Declaration on Fundamental Principles and Rights at Work	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: Company has a commitment to the ILO Core</li> <li>• Not Met: Company has a explicit commitment to All four ILO Core</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Company expect suppliers to commit to ILO Core: The Company states in its Ethics Code of Conduct: 'We expect our suppliers and partners to act according to ethical standards that are consistent with our values and our sustainability vision.' No statement committing to respect the rights that the ILO has declared to be fundamental rights at work was found in a suitable source for policy statement, according to CHRB's revised approach. [Ethics Code of Conduct, 10/2021: <a href="https://www.corpo.couche-tard.com">corpo.couche-tard.com</a>]</li> <li>• Not Met: Company explicitly list All four ILO for suppliers</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1.2.b	Commitment to respect the human rights of workers: Health and safety and working hours	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: Commitment to respect H&amp;S of workers: The Company indicates in its Ethics Code of Conduct: 'ACT also strives to provide a safe and healthy work environment.' However, 'strives to' is not considered a formal statement of commitment according to CHRB wording criteria. No additional statements found in a suitable source for policy statements under CHRB's revised approach. [Ethics Code of Conduct, 10/2021: <a href="http://corpo.couche-tard.com">corpo.couche-tard.com</a>]</li> <li>• Not Met: Respect ILO labour standards on working hours or Commits to 48 hours regular work week</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Expect suppliers to commit to H&amp;S of their workers: The Company states in its Ethics Code of Conduct: 'We expect our suppliers and partners to act according to ethical standards that are consistent with our values and our sustainability vision.' However, no statement committing to respect the health and safety of their workers was found in a suitable source for policy statement according to CHRB's revised approach. [Ethics Code of Conduct, 10/2021: <a href="http://corpo.couche-tard.com">corpo.couche-tard.com</a>]</li> <li>• Not Met: Expect suppliers to commit to ILO labour standard or to 48 hours regular work week</li> </ul>
A.1.3.a.AG	Commitment to respect human rights particularly relevant to the industry – land, natural resources and indigenous peoples' rights (AG)	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: Respect land ownership and natural resources as set out in VGGT</li> <li>• Not Met: Respect land ownership and natural resources as set out in The IFC Performance Standards</li> <li>• Not Met: Respecting indigenous peoples' rights or ILO Convention No.169 or UN Declaration</li> <li>• Not Met: Expecting suppliers to make these commitments</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Respecting the right to water</li> <li>• Not Met: Company's policy commits to obtain FPIC</li> <li>• Not Met: Expecting suppliers to make these commitments</li> </ul>
A.1.3.b.AG	Commitment to respect human rights particularly relevant to the industry – vulnerable groups (AG)	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: The Company reports in its Sustainability Report 2021 about the activities of the ACT Women's Council. However, no statement found where the Company commits to respect Women's rights, in a suitable source for policy statement according to CHRB's revised approach. [Sustainability Report 2021, 06/2021: <a href="http://corpo.couche-tard.com">corpo.couche-tard.com</a>]</li> <li>• Not Met: Children's rights: The Company indicates in its Sustainability Report 2019 that it is 'committed to supporting and empowering youth and their families to enrich their quality of life and help them achieve their ambitions'. However, no statement where the Company commits to respect Children's rights was found in a suitable source for policy statement according to CHRB's revised approach. [Sustainability Report 2019, 07/2019: <a href="http://corpo.couche-tard.com">corpo.couche-tard.com</a>]</li> <li>• Not Met: Migrant worker's rights</li> <li>• Not Met: Expects suppliers to respect at least one of these rights: The Company states in its Ethics Code of Conduct: 'We expect our suppliers and partners to act according to ethical standards that are consistent with our values and our sustainability vision.' However, no statement where the Company requires its suppliers to respect Women's, Children's or Migrants' rights was found in a suitable source for policy statement according to CHRB's revised approach. [Ethics Code of Conduct, 10/2021: <a href="http://corpo.couche-tard.com">corpo.couche-tard.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</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 remedy	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: The Company commits to remedy</li> <li>• Not Met: Company expect suppliers to make this commitment</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Collaborating with other remedy initiatives</li> <li>• Not Met: Work with suppliers to remedy impact</li> </ul>
A.1.5	Commitment to respect the	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Zero tolerance attacks on HRs Defenders (HRDs)</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
	rights of human rights defenders		<ul style="list-style-type: none"> <li>• Not Met: Company expect suppliers to make this commitment</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Work with HRD to create safe and enabling environment</li> </ul>

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.2.1	Commitment from the top	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Board level responsibility for HRs</li> <li>• Not Met: Describe HR expertise of Board member [Ethics Code of Conduct, 10/2021: <a href="http://corpo.couche-tard.com">corpo.couche-tard.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Speeches/letters by Board members or CEO</li> </ul>
A.2.2	Board responsibility	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Board/Committee review HRs strategy</li> <li>• Not Met: Examples/trends re HR discussion in the last reporting period</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Meets both requirements under score 1</li> <li>• Not Met: How affected stakeholders/HR experts informed discussions [Ethics Code of Conduct, 10/2021: <a href="http://corpo.couche-tard.com">corpo.couche-tard.com</a>]</li> </ul>
A.2.3	Incentives and performance management	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Incentives for at least one board member</li> <li>• Not Met: At least one key 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> <li>• Not Met: Review of other board performance criteria</li> </ul>
A.2.4	Business model strategy and risks	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Board process to review bussiness model and strategy: The company states: "Develop, review and recommend at least annually to the Board a set of corporate governance guidelines in accordance with applicable laws, regulations and review of best practices." However, no information found related to the process of reviewing the company's business model of strategy. [Human Ressources and Governance Committee Charter, 06/2020: <a href="http://corpo.couche-tard.com">corpo.couche-tard.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Describe frequency and triggers for reviewing [Human Ressources and Governance Committee Charter, 06/2020: <a href="http://corpo.couche-tard.com">corpo.couche-tard.com</a>]</li> <li>• Not Met: Meets both requirements under score 1</li> <li>• Not Met: Example of actions decided</li> </ul>

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

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.1	Responsibility and resources for day-to-day human rights functions	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Score of 1 on A.1.2.a</li> <li>• Not Met: Senior responsibility for HR implementation and decision making: The Company has established a new position of Sustainability Executive Owner, however, it is not clear if the responsibility of this role includes human rights issues. [Sustainability Report 2019, 07/2019: <a href="http://corpo.couche-tard.com">corpo.couche-tard.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: How it assigns Day-to-day responsibility</li> <li>• Not Met: Day-to-day resources and expertise allocation in own ops [Sustainability Report 2021, 06/2021: <a href="http://corpo.couche-tard.com">corpo.couche-tard.com</a>]</li> <li>• Not Met: Resources and expertise allocation in the supply chain</li> </ul>
B.1.2	Incentives and performance management	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Senior manager incentives for human rights</li> <li>• Not Met: At least one key 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>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Not Met: Review of other senior management performance [Policy regarding diversity on the Board of Directors and in Executive Officer Positions, 2021: <a href="http://corpo.couche-tard.com">corpo.couche-tard.com</a>]</li> </ul>
B.1.3	Integration with enterprise risk management	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: HR risks is integrated as part of enterprise risk system: The Company discloses that 'we require key suppliers, including our private brands, fresh food, chemical and transportation suppliers, security and legal services to participate in our sustainability supplier assessment program, which provides an independently audited evaluation and analysis of possible safety, security, health, human rights and environmental, social and ethical risks'. However, no description found about how attention to human rights risks are integrated as part of its broader enterprise risk management systems. [Sustainability Report 2019, 07/2019: <a href="http://corpo.couche-tard.com">corpo.couche-tard.com</a>]</li> <li>• Not Met: Provides an example: No information found related to this datapoint.</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Audit Ctte or independent risk assessment</li> </ul>
B.1.4.a	Communication /dissemination of policy commitment(s) to workers and external stakeholders	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Score of 1 on A.1.2.a</li> <li>• Not Met: Communicates its policy to all workers in own operations: The company states that "This Code applies to all of us, in every country we operate, and at all times: - Employees; - Executive officers; - Members of the Board of Directors (the "Board"); - consultants, intermediaries, lobbyists, anyone who acts on our behalf." However, it is not clear how the company communicates its policy. [Ethics Code of Conduct, 10/2021: <a href="http://corpo.couche-tard.com">corpo.couche-tard.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Communication of policy commitments to stakeholder: The company states: "We are committed to communicating with our stakeholders - our shareholders, employees, customers and communities where we do business - and have specific procedures to make sure we are consistent and fair about what we say and how we say it." However, not clear if the company communicates its policy to communities [Ethics Code of Conduct, 10/2021: <a href="http://corpo.couche-tard.com">corpo.couche-tard.com</a>]</li> <li>• Not Met: How policy commitments are made accessible to audience</li> </ul>
B.1.4.b	Communication /dissemination of policy commitment(s) to business relationships	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: Meets ILO requirement for suppliers on A.1.2.a</li> <li>• Not Met: Steps to communicate policy commitments to supply chain</li> <li>• Not Met: Requires suppliers to communicate policy requirements</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: How HR commitments made binding/contractual: The Company state that "We engage with suppliers through a due diligence process to understand and assess supplier programs. We look at business integrity, quality, health and safety, labour conditions, human rights, environmental issues, and ethical practices, among other topics. In the U.S. and Canada, we have clauses on environmental issues, safety, security, and ethics. In Europe, suppliers are required to complete our supplier declaration to attest their commitment of compliance to our requirements, which includes our environmental, social, and governance expectations."</li> <li>• Not Met: Company requires suppliers to cascade down to their suppliers</li> </ul>
B.1.5	Training on Human Rights	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Scores at least 1 on A.1.2.a</li> <li>• Not Met: How workers are trained on HR policy commitments: The Company states: "During a year clearly marked by the pandemic, the importance of workplace safety has been brought even more to the forefront. We have improved our programs, benefits, and training to reduce workplace incidents." However, it is not clear if the company has performed overall human rights training to its workers. [Sustainability Report 2021, 06/2021: <a href="http://corpo.couche-tard.com">corpo.couche-tard.com</a>]</li> <li>• Not Met: Trains relevant managers including procurement</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Score of 2 on A.1.2.a</li> <li>• Not Met: Meets both requirements under score 1</li> <li>• Not Met: Trains suppliers to meet company's HR commitment: The company states: "We expect our suppliers and partners to act according to ethical standards that are consistent with our values and our sustainability vision. Before we establish activity, we may assess whether it would pose any risks relating to human rights, corruption, health, safety and the environment, and ultimately to our</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			reputation." However, it is not clear if the company includes training suppliers. [Ethics Code of Conduct, 10/2021: <a href="http://corpo.couche-tard.com">corpo.couche-tard.com</a> ] <ul style="list-style-type: none"> <li>• Not Met: Disclose % trained</li> </ul>
B.1.6	Monitoring and corrective actions	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Scores at least 1 on A.1.2.a: The company does not meet the ILO requirements required to meet this indicator</li> <li>• Not Met: Monitoring implementation of HR policy commitments across global ops and supply chain: In its Sustainability Report 2019, the Company states: 'We engage with suppliers through a due diligence process to understand and assess supplier programs. We look at business integrity, quality, health &amp; safety, labour conditions, human rights, environmental issues, and ethical practices, among other topics'. However, regarding performance monitoring, the Company states the following: 'Supplier performance in sustainability, particularly safety, is monitored on an ongoing basis. In Europe, we require key suppliers, including our private brands, fresh food, chemical and transportation suppliers, security and legal services to participate in our sustainability supplier assessment program, which provides an independently audited evaluation and analysis of possible safety, security, health, human rights and environmental, social and ethical risks'. It is not clear how the Company monitors its suppliers generally in human rights matters. [Sustainability Report 2019, 07/2019: <a href="http://corpo.couche-tard.com">corpo.couche-tard.com</a>]  <ul style="list-style-type: none"> <li>• Not Met: Proportion of supply chain monitored</li> <li>• Not Met: Describe how workers are involved in monitoring</li> </ul> </li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Score of 2 on A.1.2.a: The company does not meet the ILO requirements required to meet this indicator</li> <li>• Not Met: Describes corrective action process</li> <li>• Not Met: Disclose findings and number of corrective action</li> </ul>
B.1.7	Engaging and terminating business relationships	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Met: HR affects selection of suppliers: The company states: "We expect our suppliers and partners to act according to ethical standards that are consistent with our values and our sustainability vision. Before we establish activity, we may assess whether it would pose any risks relating to human rights, corruption, health, safety and the environment, and ultimately to our reputation." [Ethics Code of Conduct, 10/2021: <a href="http://corpo.couche-tard.com">corpo.couche-tard.com</a>]  <ul style="list-style-type: none"> <li>• Not Met: HR affects on-going supplier relationships</li> </ul> </li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Describe positive incentives offered to respect human rights</li> <li>• Not Met: Working with suppliers to meet HR requirements</li> </ul>
B.1.8	Approach to engagement with affected stakeholders	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Stakeholder process or systems to identify and engage with workers/communities in the last two years: Although the Company states in its Sustainability Report 2019 that it engages 'with a variety of stakeholders to understand and keep in touch with their views, including on the social, environmental and ethical issues that are important to them' and it lists its stakeholders groups, no further information found about how it has identified, and engaged with affected and potentially affected stakeholders in the last two years. [Sustainability Report 2019, 07/2019: <a href="http://corpo.couche-tard.com">corpo.couche-tard.com</a>]  <ul style="list-style-type: none"> <li>• Not Met: Discloses stakeholders that HRs may be affected</li> <li>• Not Met: Provides two examples of engagement with stakeholders: No information found related to this datapoint.</li> </ul> </li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Analysis of stakeholder views on company's HR issues</li> <li>• Not Met: Describe how views influenced company's HR approach</li> </ul>

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.1	Identifying human rights risks and impacts	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Identifying risks in own operations: The Company indicates that 'prior to establishing a business relationship with a potential counterparty or starting an activity, Couche-Tard will, at its discretion, assess the risks involved in taking such a course of action in relation to human rights, corruption or health, safety and environment'. In addition, the Company lists its material issues in its Sustainability Report, however, it is not clear how they are related to the Company's operation in specific locations or activities. [Ethics Code of Conduct, 10/2021: <a href="https://corpo.couche-tard.com">corpo.couche-tard.com</a>]</li> <li>• Not Met: Identifying risks through relevant business relationships</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Describe ongoing global risk identification in consultation with stakeholder/HR experts</li> <li>• Not Met: Triggered by new circumstances</li> <li>• Not Met: Describes risks identified</li> </ul>
B.2.2	Assessing 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: Describe process for assessment of HR risks and discloses salient HR issues</li> <li>• Not Met: How process applies to supply chain</li> <li>• Not Met: Public disclosure of the results of HR assessment</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Meets all requirements under score 1</li> <li>• Not Met: How it involved affected stakeholders in the assessment</li> </ul>
B.2.3	Integrating and acting on human rights risks and impact assessments	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: Action Plans to mitigate risks</li> <li>• Not Met: Description of how global system applies to supply chain</li> <li>• Not Met: Example of actions decided on at least 1 salient HR issues</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Meets all requirements under score 1</li> <li>• Not Met: Involve stakeholders in decisions about actions [Sustainability Report 2021, 06/2021: <a href="https://corpo.couche-tard.com">corpo.couche-tard.com</a>]</li> </ul>
B.2.4	Tracking 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 for tracking or monitor if actions taken are effective</li> <li>• Not Met: Lessons learnt from checking system effectiveness</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Meets both requirements under score 1</li> <li>• Not Met: Involve stakeholders in evaluation of actions taken</li> </ul>
B.2.5	Communicating on human rights 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: Provides two examples of comms with stakeholders [Ethics Code of Conduct, 10/2021: <a href="https://corpo.couche-tard.com">corpo.couche-tard.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Describe challenges to effective comms and how it is working to address them</li> </ul>

## C. Remedies and Grievance Mechanisms (20% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.1	Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Channel accessible to all workers: The company state that it "has a channel called The ACT Hotline, access to employees and where you can do a anonymous report." [Ethics Code of Conduct, 10/2021: <a href="https://corpo.couche-tard.com">corpo.couche-tard.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Channel is available in all appropriate languages and workers aware</li> <li>• Not Met: Describe how workers in the supply chain have access to grievance mechanism</li> <li>• Not Met: Expect Suppliers to convey expectation to their own suppliers</li> </ul>



Indicator Code	Indicator name	Score (out of 2)	Explanation
C.2	Grievance channel(s)/mechanism(s) to receive complaints or concerns from external individuals and communities	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Not Met: Grievance mechanism for community: The company does not clearly indicate whether the ACT mechanisms is open to all external stakeholders [Ethics Code of Conduct, 10/2021: <a href="http://corpo.couche-tard.com">corpo.couche-tard.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Not Met: Describes accessibility and local languages and stakeholder awareness</li> <li>Not Met: Communities access mechanism direct or through suppliers</li> <li>Not Met: Expect supplier to convey expectation to their own suppliers</li> </ul>
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: Examples (at least two) of how they do this</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Not Met: Engages with potential or actual users on the improvement of the mechanism</li> <li>Not Met: Provides user engagement example (at least two) on improvement</li> </ul>
C.4	Procedures related to the mechanism(s)/channel(s) are equitable, publicly available and explained	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Not Met: Response timescales and how complainants will be informed: The Company state that Ethics issues are reviewed by the Legal Department and/or HR Department. However, no information found on timescale to inform complainants or how complainants are informed. [Ethics Code of Conduct, 10/2021: <a href="http://corpo.couche-tard.com">corpo.couche-tard.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Not Met: Describe support (technical, financial,etc) available for equal access by complainants</li> <li>Not Met: Describe types of outcome to complainant through use of mechanism</li> <li>Not Met: Escalation to senior/independent level</li> </ul>
C.5	Prohibition of retaliation for raising complaints or concerns	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Met: Public statement prohibiting retaliation: The company states: "ACT expects you to do the right thing and will protect you when you report in good faith. You will not lose your job, your salary and other terms of employment will not change, and you will not be discriminated against. If a n employee retaliates against you for reporting a concern, he or she will face disciplinary action, which may include termination without notice." [Ethics Code of Conduct, 10/2021: <a href="http://corpo.couche-tard.com">corpo.couche-tard.com</a>]</li> <li>Met: Practical measures to prevent retaliation: The Company's ACT Hotline guarantees anonymity to individuals raising a concern.</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Not Met: Company indicate it will not retaliate against workers/stakeholders</li> <li>Not Met: Expects suppliers to prohibit retaliation against workers/stakeholders</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: Complainants not asked to waive rights</li> <li>Not Met: Company does not require confidentiality provisions: The company's channel allows for anonymous reporting, however no information found regarding asking individuals or communities to raise their legal rights. [Ethics Code of Conduct, 10/2021: <a href="http://corpo.couche-tard.com">corpo.couche-tard.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Not Met: Will work with state based non judicial mechanisms</li> <li>Not Met: Example of issue resolved (if applicable)</li> </ul>
C.7	Remedying adverse impacts	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Not Met: Describes how remedy has been provided</li> <li>Not Met: Says how it would provide remedy for victims if no adverse impact identified</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Not Met: Changes to systems, processes and practices to stop similar impact</li> <li>Not Met: Describe approach to monitoring implementation of agreed remedy</li> <li>Not Met: Approach to learning from incident to prevent future impacts</li> </ul>
C.8	Communication on the effectiveness of grievance	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Not Met: Number grievances filed, addressed or resolved and outcome achieved</li> <li>Not Met: How lessons from mechanism improve management system</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
	mechanism(s) and incorporating lessons learned		Score 2 <ul style="list-style-type: none"> <li>• Not Met: Evaluation of the channel/mechanism and changes made as result</li> <li>• Not Met: Describes procedures to address delays of outcomes agreed with stakeholders</li> </ul>

### D. Performance: Company Human Rights Practices (25% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.1.1.b	Living wage (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Discloses timebound target for suppliers to pay living wage or include in code or contracts</li> <li>• Not Met: Improving living wage practices of suppliers</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Assessment of number affected by payment below living wage</li> <li>• Not Met: Provides analysis of trends demonstrating progress</li> </ul>
D.1.2	Aligning purchasing decisions with human rights	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Avoids business model pressure on HRs (purchasing practices)</li> <li>• Not Met: Practices adopted to pay suppliers in line with agreed timeframes</li> <li>• Not Met: Review own operations to mitigate negative impact [Sustainability Report 2021, 06/2021: <a href="http://corpo.couche-tard.com">corpo.couche-tard.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Meets all requirements under score 1</li> <li>• Not Met: Examples of how it assessed, addressed and change purchasing practices [Sustainability Report 2021, 06/2021: <a href="http://corpo.couche-tard.com">corpo.couche-tard.com</a>]</li> </ul>
D.1.3	Mapping and disclosing the supply chain	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Identifies direct and indirect suppliers back to manufacturing sites (factories or fields)</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Discloses names and locations of significant parts of SP and why</li> <li>• Not Met: Discloses which direct or indirect suppliers is involved in higher-risk activities</li> </ul>
D.1.4.b	Prohibition of child labour: Age verification and corrective actions (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Child Labour rules in codes or contracts</li> <li>• Not Met: How working with suppliers on child labour</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Assesment of number affected by child labour in supply chain</li> <li>• Not Met: Analysis of trends in progress made</li> </ul>
D.1.5.b	Prohibition of forced labour: Recruitment fees and costs (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Debt and fees rules in codes or contracts</li> <li>• Not Met: How working with suppliers on debt &amp; fees</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Assessment of the number affected by payment of recruitment fees</li> <li>• Not Met: Analysis of trends in progress made</li> </ul>
D.1.5.d	Prohibition of forced labour: Wage practices (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Suppliers to pay workers in full and on time in codes or contracts</li> <li>• Not Met: How working with supply chain to pay workers regularly and on time</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Assessment of the number affected by failure to pay directly</li> <li>• Not Met: Provides analysis of trends demonstrating progress</li> </ul>
D.1.5.f	Prohibition of forced labour: Restrictions on workers (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Free movement rules in codes or contracts</li> <li>• Not Met: How working with suppliers on free movement</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Assessment of the number affected by retaining docs or restricting movement</li> <li>• Not Met: Provides analysis of trends demonstrating progress</li> </ul>



Indicator Code	Indicator name	Score (out of 2)	Explanation
D.1.6.b	Freedom of association and collective bargaining (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: FoA &amp; CB rules in codes or contracts</li> <li>• Not Met: How working with suppliers on FoA and CB</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Assessment of the number affected by restrictions to FoA and CB in the SP</li> <li>• Not Met: Provides analysis of trends demonstrating progress</li> </ul>
D.1.7.b	Health and safety: Fatalities, lost days, injury, occupational disease rates (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Sets out clear Health and Safety requirements</li> <li>• Not Met: Injury Rate or Lost days or Near miss disclosures for last reporting period: The Company discloses High Consequences Work-related Injuries rates and Recordable Work-related injuries rates per 200,000 hours worked for the past three years. However, the data correspond to the Company's own operation. No information found about suppliers' workers. [Sustainability Report 2019, 07/2019: <a href="http://corpo.couche-tard.com">corpo.couche-tard.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Fatalities rate for lasting reporting period: The Company discloses the number of fatalities for the past three years. However, the data correspond to the Company's own operation. No evidence found about suppliers' workers. [Sustainability Report 2019, 07/2019: <a href="http://corpo.couche-tard.com">corpo.couche-tard.com</a>]</li> <li>• Not Met: Occupation disease rate for last reporting period</li> <li>• Not Met: How working with suppliers on H&amp;S</li> <li>• Not Met: Assessment of the number affected by H&amp;S issues in the SP</li> <li>• Not Met: Provides analysis of trends demonstrating progress</li> </ul>
D.1.8.b	Land rights: Land acquisition (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Rules on land &amp; owners in codes or contracts</li> <li>• Not Met: How working with suppliers on land issues</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Includes resettlement requirements that the supplier provides financial compensation</li> <li>• Not Met: Assessment of the number affected by land rights issues in its SP</li> <li>• Not Met: Provides analysis of trends demonstrating progress</li> </ul>
D.1.9.b	Water and sanitation (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Rules on water stewardship in codes or contracts</li> <li>• Not Met: How working with suppliers on water stewardship issues</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Assessment on the number affected by lack of access to water and sanitation</li> <li>• Not Met: Provides analysis of trends demonstrating progress</li> </ul>
D.1.10.b	Women's rights (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Women's rights in codes or contracts</li> <li>• Not Met: How working with suppliers on women's rights</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Assessment on the number affected by discrimination or unsafe working conditions</li> <li>• Not Met: Provides analysis of trends demonstrating progress</li> </ul>

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
E(1).0	Serious allegation No 1		No allegations meeting the CHRB severity threshold were found, and so the score of 2.68 out of 80 points scored in themes A-D has been applied to produce a score of 0.67 out of 20 points for theme E.

### 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 2020 Key Findings report and the 2019 technical annex for more details of the research process.

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As WBA, 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.

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