

**Company Name** Asahi Group  
**Industry** Agricultural Products (Supply Chain only)  
**Overall Score** 19.8 out of 100

Theme Score	Out of	For Theme
3.3	10	A. Governance and Policies
10.1	25	B. Embedding Respect and Human Rights Due Diligence
2.5	20	C. Remedies and Grievance Mechanisms
0.0	25	D. Performance: Company Human Rights Practices
4.0	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	2	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Met: Universal Declaration of Human rights (UDHR): The Company states that it is 'committed to respecting human rights that are recognized internationally and set out in the International Bill of Human Rights' and 'the International Bill of Human Rights refers to three internationally-recognized human rights documents: the Universal Declaration of Human Rights and its corresponding two international treaties, namely the International Covenant on Civil and Political Rights, and the International Covenant on Economic, Social and Cultural Rights'. [Human Rights Principles (modified on Jun 2022), 03/2021: <a href="https://www.asahigroup-holdings.com">asahigroup-holdings.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Met: Commitment to the UNGPs: The Company states that 'we are also committed to the United Nations Guiding Principles on Business and Human Rights'. [Human Rights Principles (modified on Jun 2022), 03/2021: <a href="https://www.asahigroup-holdings.com">asahigroup-holdings.com</a>]</li> </ul>
A.1.2.a	Commitment to respect the human rights of workers: ILO Declaration on Fundamental Principles and Rights at Work	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Met: Company has a commitment to the ILO Core: The Company states that 'we are committed to respecting human rights that are recognized internationally and set out in the International Bill of Human Rights and the principles concerning fundamental rights in the International Labour Organization's Declaration on Fundamental Principles and Rights at Work.' [Human Rights Principles (modified on Jun 2022), 03/2021: <a href="https://www.asahigroup-holdings.com">asahigroup-holdings.com</a>]</li> <li>Met: Company has a explicit commitment to All four ILO Core: The Company states that is committed to ILO and describes that 'ILO Declaration on Fundamental Principles and Rights at Work sets out principles concerning</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>fundamental rights as minimum labor standards to be protected: freedom of association and the right to collective bargaining, elimination of all forms of forced or compulsory labor, the effective abolition of child labor, and the elimination of discrimination in respect of employment and occupation'. With respect freedom of association and collective bargaining, the Company indicates: 'We will respect the freedom of association and the right to collective bargaining in accordance with the applicable laws and regulations of the countries and regions where we do business. Where the right to freedom of association and collective bargaining is restricted under national/regional laws and regulations in contravention of international human rights standards, we will seek ways to honor these rights by establishing alternative means of dialogue with employees'. [Human Rights Principles (modified on Jun 2022), 03/2021: <a href="http://asahigroup-holdings.com">asahigroup-holdings.com</a>]</p> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Company expect suppliers to commit to ILO Core</li> <li>• Not Met: Company explicitly list All four ILO for suppliers: The Company Human Rights Policy states that it 'expect our business partners, including our suppliers, to understand and uphold these Principles and to work with us to ensure that our business complies with these Principles'. However, it is not clear what are the requirements in case freedom of association and collective bargaining are restricted in local laws, according to the requirements of the Sustainable procurement principles. In its Sustainable Procurement Principles, the Company includes requirement with respect ILO Core, including: 'Suppliers should not discriminate [...] Suppliers should not allow any form of modern slavery, including human trafficking. Suppliers should eliminate forced labor. Suppliers should abolish child labor effectively. Suppliers should respect the freedom of association and the right to collective bargaining in accordance with the applicable laws and regulations of the countries and regions where they do business'. In these cases (companies referring to local laws in freedom of association and collective bargaining), companies are expected to require alternative mechanisms or equivalent workers bodies where the right to freedom of association and collective bargaining is restricted under law. [Sustainable Procurement Principles and Code of Conduct, N/A: <a href="http://asahigroup-holdings.com">asahigroup-holdings.com</a>] &amp; [Human Rights Principles (modified on Jun 2022), 03/2021: <a href="http://asahigroup-holdings.com">asahigroup-holdings.com</a>]</li> </ul>
A.1.2.b	Commitment to respect the human rights of workers: Health and safety and working hours	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: Commitment to respect H&amp;S of workers: The Company states in its Human Rights Principles document: 'We will keep updated on laws and regulations concerning health and safety in our workplace and the status of their implementation, and always work to maintain a safe and healthy work environment'. [Human Rights Principles (modified on Jun 2022), 03/2021: <a href="http://asahigroup-holdings.com">asahigroup-holdings.com</a>] &amp; [For Employee Safety - web, N/A: <a href="http://asahigroup-holdings.com">asahigroup-holdings.com</a>]</li> <li>• Not Met: Respect ILO labour standards on working hours or Commits to 48 hours regular work week: The Company indicates in its Human Rights Policy: 'We will comply with all applicable laws and regulations related to working hours and wages of the countries and regions where we do business. We will work towards ensuring wages that enable our employees to meet their basic needs of living.' However, no formal commitment about respecting the ILO conventions on working hours was found. Alternatively, the Company would achieve this by committing to a 48 hours regular working week, and consensual overtime paid at a premium rate. [Human Rights Principles (modified on Jun 2022), 03/2021: <a href="http://asahigroup-holdings.com">asahigroup-holdings.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Expect suppliers to commit to H&amp;S of their workers: In the Sustainable Procurement Principles / Supplier code, the Company requires: 'Suppliers should ensure safe and healthy work environment'. [Sustainable Procurement Principles and Code of Conduct, N/A: <a href="http://asahigroup-holdings.com">asahigroup-holdings.com</a>]</li> <li>• Not Met: Expect suppliers to commit to ILO labour standard or to 48 hours regular work week: In addition, in its Sustainable Procurement Principles, it indicates: 'Suppliers should comply with all applicable laws and regulations related to working hours and wages, especially to minimum wages, of the countries and regions where they do business.' However, no formal commitment about respecting the ILO conventions on working hours was found. Alternatively, the Company would achieve this by requiring 48 hours regular working week, and consensual overtime paid at a premium rate. [Sustainable Procurement Principles and Code of Conduct, N/A: <a href="http://asahigroup-holdings.com">asahigroup-holdings.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
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: In its Human Rights Policy, the Company states: 'We acknowledge that our business can have impacts on human rights within the community, such as land rights, access to water, health, and the rights of indigenous peoples. We are committed to upholding our human rights responsibility in the communities in which we do business, and aim to contribute to a sustainable society.' However, no commitment to Voluntary Guidelines on Tenure Rights was found. [Human Rights Principles (modified on Jun 2022), 03/2021: <a href="http://asahigroup-holdings.com">asahigroup-holdings.com</a>]</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: The Company states that recognize that its operations can impact access to water but also states that is 'committed to upholding our human rights responsibility in the communities in which we do business, and aim to contribute to a sustainable society'. However, no direct, explicit, commitment found to respect the right to water. [Human Rights Principles (modified on Jun 2022), 03/2021: <a href="http://asahigroup-holdings.com">asahigroup-holdings.com</a>] &amp; [Company website, Dialogue 2015, N/A: <a href="http://asahigroup-holdings.com">asahigroup-holdings.com</a>]</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)	0.5	<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: Women's rights: The Company indicates in its Sustainability Data Book 2021: 'Asahi Group Holdings, Ltd. has signed the Women’s Empowerment Principles, a guideline jointly developed by the UN Global Compact and the United Nations agency UN Woman to promote gender equality and women’s empowerment'. Although the commitment is not framed in a policy document, the Company has signed the WEPs. [Sustainability Data Book 2021, 06/2022: <a href="http://asahigroup-holdings.com">asahigroup-holdings.com</a>]</li> <li>• Not Met: Children's rights [Human Rights Principles (modified on Jun 2022), 03/2021: <a href="http://asahigroup-holdings.com">asahigroup-holdings.com</a>]</li> <li>• Not Met: Migrant worker’s rights [Human Rights Principles (modified on Jun 2022), 03/2021: <a href="http://asahigroup-holdings.com">asahigroup-holdings.com</a>]</li> <li>• Not Met: Expects suppliers to respect at least one of these rights</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: CEDAW/Women's Empowerment Principles: As indicated above, the Company reports: 'Asahi Group Holdings, Ltd. has signed the Women’s Empowerment Principles, a guideline jointly developed by the UN Global Compact and the United Nations agency UN Woman to promote gender equality and women’s empowerment'. [Sustainability Data Book 2021, 06/2022: <a href="http://asahigroup-holdings.com">asahigroup-holdings.com</a>]</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	0.5	<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: The Company commits to remedy: The Company states in its Human Rights Policy: 'We pursue prevention against infringing human rights or contributing to human rights infringements by stakeholders, including our suppliers and other business partners. If we identify that we have caused or contributed to such infringement, we will take action to remediate such impacts'. [Human Rights Principles (modified on Jun 2022), 03/2021: <a href="http://asahigroup-holdings.com">asahigroup-holdings.com</a>]</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 rights of human rights defenders	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Zero tolerance attacks on HRs Defenders (HRDs)</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: 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	0.5	<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: Board level responsibility for HRs: The Company indicates in its Human Rights Principles: 'The Board of Directors [...] is responsible for ensuring adherence to our human rights commitments and has responsibility for overseeing the implementation of these commitments. 'In addition, on its website, it indicates: 'the Board of Directors [...] takes supervisory responsibility, and has specified its role (under the Asahi Group Human Rights Principles) of performing regularly monitoring of the state of compliance with the Principles, and the progress of related initiatives. In order to reduce the risk of human rights infringements in the Group's business activities as a whole, we have established the Asahi Group Human Rights Council as part of sustainability task force in our new sustainability promotion framework. Human rights issues discussed by the Council are reported to the responsible director (Executive Officer, CHRO, in charge of sustainability), discussed at the Corporate Strategy Board, and then reported to the Board of Directors for further discussion.' And finally, according its Data book 2021: 'The Board of Directors at Asahi Group Holdings, Ltd. is responsible for overseeing initiatives to respect human rights, and the Human Rights Principles stipulate that the Board of Directors regularly monitor the compliance with the Principles and the progress of the efforts. The CEO is responsible for making the final decision'. [Respect for Human Rights, N/A: <a href="http://asahigroup-holdings.com">asahigroup-holdings.com</a>] &amp; [Human Rights Principles (modified on Jun 2022), 03/2021: <a href="http://asahigroup-holdings.com">asahigroup-holdings.com</a>]</li> <li>• Not Met: Describe HR expertise of Board member: The Company has provided comment/source to CHRB regarding this indicator. However, evidence was not material.</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Speeches/letters by Board members or CEO: The Company reports about participation in 'My Declaration of Human Rights' initiative, where companies, organizations, and individuals which express that they will take actions to respect human rights. However, no further information was found indicating that the CEO or a Board member discusses why human rights matter to the business or any challenges to respecting human rights encountered by the business.</li> </ul>
A.2.2	Board responsibility	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>• Not Met: Board/Committee review HRs strategy: The Company states in its Human Rights Principles: 'The Board of Directors of Asahi Group Holdings, Ltd. is responsible for ensuring adherence to our human rights commitments and has responsibility for overseeing the implementation of these commitments'. However, no further evidence found about the processes it has in place to discuss and regularly review its human rights strategy or policy or management processes at board level or a board committee. [Human Rights Principles (modified on Jun 2022), 03/2021: <a href="http://asahigroup-holdings.com">asahigroup-holdings.com</a>]</li> <li>• Met: Examples/trends re HR discussion in the last reporting period: The Company reports in its Sustainability Data Book 2021: 'In 2021, we invited experts to hold a dialogue on human rights with the CEO, CAO, and CHRO of Asahi Group Holdings, Ltd. The purpose was to provide opportunities to have a realistic image of the possible problems as a global company, consider what management decisions would be necessary when as such problems occur, and to deepen understanding of business and human rights. Experts mentioned the essentials of "business and human rights," such as the attitude and approaches to respecting human rights required of companies and top management. In response to the dialogues, discussions are held at the Corporate Strategy Board few times to enhance the effectiveness of the Human Rights Principles. Major points raised • Incorporating the perspectives of respect for human rights into corporate activities as a whole is a management issue that requires commitment;• In order for companies to fulfill their responsibility to respect human rights, it is essential to understand human rights, agree with them, and put them into practice;• For whom and for what respect for human rights? The starting point should be "human rights risk," not management risk.' In addition, it indicates in its Corporate Governance Report: 'II. Response to the Issues Identified in Fiscal 2020: 1. Discussions related to strategies and business portfolios that anticipate ultra-longterm and long-term megatrends [...] 3. Implementation of discussions and monitoring of integrating the sustainability strategies and management strategies :The Board of Directors held discussions on integration of sustainability into management, and also conducted deliberations about sustainability in the</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>deliberations on the Medium- to Long-Term Management Policy; The Board of Directors reported the status of responses to important matters such as respect for human rights'. [Sustainability Data Book 2021, 06/2022: <a href="http://asahigroup-holdings.com">asahigroup-holdings.com</a>] &amp; [Corporate governance report 2022, 2022: <a href="http://asahigroup-holdings.com">asahigroup-holdings.com</a>]</p> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Meets both requirements under score 1</li> <li>• Met: How affected stakeholders/HR experts informed discussions: As indicated above: 'In 2021, we invited experts to hold a dialogue on human rights with the CEO, CAO, and CHRO of Asahi Group Holdings, Ltd. The purpose was to provide opportunities to have a realistic image of the possible problems as a global company, consider what management decisions would be necessary when as such problems occur, and to deepen understanding of business and human rights. Experts mentioned the essentials of "business and human rights," such as the attitude and approaches to respecting human rights required of companies and top management. In response to the dialogues, discussions are held at the Corporate Strategy Board few times to enhance the effectiveness of the Human Rights Principles. Major points raised</li> <li>• Incorporating the perspectives of respect for human rights into corporate activities as a whole is a management issue that requires commitment;</li> <li>• In order for companies to fulfill their responsibility to respect human rights, it is essential to understand human rights, agree with them, and put them into practice;</li> <li>• For whom and for what respect for human rights? The starting point should be "human rights risk," not management risk'. [Sustainability Data Book 2021, 06/2022: <a href="http://asahigroup-holdings.com">asahigroup-holdings.com</a>]</li> </ul>
A.2.3	Incentives and performance management	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Incentives for at least one board member: The Company discloses in its Corporate Governance Report on the section, Incentive Policies for Directors, that 'medium-term performance-linked bonuses are determined using financial and social value indicators set in line with the goals of the "Medium-Term Management policy" as performance benchmarks in proportion to the level of achievement of targets, which are set at the beginning of each fiscal year. The Medium-Term Management policy includes as one of its three key priorities: 'Reinforce ESG initiatives supporting our sustainable value creation process'. However, it is not clear whether human rights issues are considered in the incentive or performance management scheme. [Corporate governance report 2021, 2021: <a href="http://asahigroup-holdings.com">asahigroup-holdings.com</a>]</li> <li>• Not Met: At least one key HR risk, beyond employee H&amp;S</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Performance criteria made public: The Company discloses that 40% of Medium-term bonuses of boards are based on social value indicators. However, as indicated above it is not clear, with the evidence found in public source, whether human rights are considered in the incentive or performance management scheme. [2019 Integrated Report, 07/2020: <a href="http://asahigroup-holdings.com">asahigroup-holdings.com</a>] &amp; [Medium-Term Management Policy, N/A: <a href="http://asahigroup-holdings.com">asahigroup-holdings.com</a>]</li> <li>• Not Met: Review of other board performance criteria</li> </ul>
A.2.4	Business model strategy and risks	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Board process to review bussiness model and strategy: On its website section 'Material Issues and KPIs of the Asahi Group', the Company presents its Initiatives to respond to its Material issues. Among these initiatives: Responsible Drinking, Respect for Human rights, Diversity, equity and inclusion. However, no further information found describing the process it has in place to discuss and review its business model and strategy for inherent risks to human rights at board level or a board committee, or how these initiative are related to the inherent risks to human rights. The Company has provided comments to CHRB regarding this indicator. However, part of this information has not been found in publicly available sources. [Material Issues and KPIs of the Asahi Group, N/A: <a href="http://asahigroup-holdings.com">asahigroup-holdings.com</a>]</li> <li>• Not Met: Describe frequency and triggers for reviewing</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: Example of actions decided: The Company has provided comments/sources to CHRB regarding this indicator. However, evidence was not material.</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	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: Score of 1 on A.1.2.a: See A.1.2.a</li> <li>• Met: Senior responsibility for HR implementation and decision making: The Company indicates on its website: 'In order to reduce the risk of human rights infringements in the Group's business activities as a whole, we have established the Asahi Group Human Rights Council as part of sustainability task force in our new sustainability promotion framework. Human rights issues discussed by the Council are reported to the responsible director (Executive Officer, CHRO, in charge of sustainability), discussed at the Corporate Strategy Board, and then reported to the Board of Directors for further discussion.' [Respect for Human Rights, N/A: <a href="http://asahigroup-holdings.com">asahigroup-holdings.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: How it assigns Day-to-day responsibility: In addition, the Company indicates on its website: 'In terms of specific initiatives, the five divisions of Asahi Group Holdings (Strategy, HR, Legal Affairs, Procurement and Sustainability) which constitute the members of the Asahi Group Human Rights Council are working together to promote due diligence with regard to human rights issues'. [Respect for Human Rights, N/A: <a href="http://asahigroup-holdings.com">asahigroup-holdings.com</a>]</li> <li>• Not Met: Day-to-day resources and expertise allocation in own ops</li> <li>• Not Met: Resources and expertise allocation in the supply chain</li> </ul>
B.1.2	Incentives and performance management	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <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> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Performance criteria made public</li> <li>• Not Met: Review of other senior management performance</li> </ul>
B.1.3	Integration with enterprise risk management	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: HR risks is integrated as part of enterprise risk system: The Company indicates on its Respect human rights website: 'in recognition of the fact that the unlikely event of human rights-related risks being actualized would have a major impact on the Asahi Group, the state of the Group's response to human rights issues is also regularly reported to the Risk Management Committee, which was established under our enterprise risk management system introduced in 2019, and whose membership consists of the CEO, other executive directors and executive committee members nominated by the CEO'. [Respect for Human Rights, N/A: <a href="http://asahigroup-holdings.com">asahigroup-holdings.com</a>]</li> <li>• Met: Provides an example: The Company presents in its Integrated Report 2021 its major risks, including: 'Boycott movements related to activities that violate human rights and other forms of corporate ethics: [Impacts] Disciplinary measures and filing of legal action due to violation of laws and regulations; Social sanctions; Impairment of Asahi's reputation and brand value and resulting decline in sales stemming from loss of stakeholder trust'. [Integrated Report 2021, 2022: <a href="http://asahigroup-holdings.com">asahigroup-holdings.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Audit Ctte or independent risk assessment: The Company states that 'The respective companies of the Asahi Group implement ERM on the basis of each business unit, and report the details of the initiatives to the Risk Management Committee of the Company. The Committee monitors the initiatives, and its members identify and evaluate critical risk across the Group, build responding plans, and execute and monitor the plans. All such initiatives are reported to the board of Directors, which ascertains the effectiveness of ERM by monitoring the initiatives. This series of activities by the Risk Management Committee and the Board of Directors is independent from those of the Audit and Supervisory Board, and thus is subject to audits performed by Audit and Supervisory Board Members'. However, no further information describing how and the Audit committee or an independent third party assesses the adequacy of the enterprise risk management system(s) in managing human rights (in last reporting year) was found. [Enterprise risk management, N/A: <a href="http://asahigroup-holdings.com">asahigroup-holdings.com</a>]</li> </ul>



Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.4.a	Communication /dissemination of policy commitment(s) to workers and external stakeholders	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Score of 1 on A.1.2.a: See indicator A.1.2.a</li> <li>• Met: Communicates its policy to all workers in own operations: The Company states on its Human Rights Principles website section: 'we avoid committing or contributing to human rights infringements, and work to redress any such infringements should they occur, by [...] providing training and education on respect for human rights to all employees. [...] the Principles are published on our website in 17 different languages, in order to promote understanding among our stakeholders'. In addition, in its Sustainability Data Book 2021, it reports: 'We are implementing training for employees in order to ingrain the Asahi Group Code of Conduct and the Asahi Group Human Rights Principles. In conjunction with World Human Rights Day on December 10, 2021, a training video by the top management of Asahi Group Holdings, Ltd. was distributed to all employees. The CEO presented a message on human rights to Group employees in Japan and abroad, and the CHRO introduced actions that each employee should take as a human rights holder and actual cases of human rights violations that have occurred around the world. In 2022, we are conducting human rights training in line with the Asahi Group's eight human rights issues, with "Discrimination and Harassment" as the theme in the first half of the year and "Forced Labor and Child Labor" in the second half'. [Human Rights Principles - web, N/A: <a href="http://asahigroup-holdings.com">asahigroup-holdings.com</a>] &amp; [Sustainability Data Book 2021, 06/2022: <a href="http://asahigroup-holdings.com">asahigroup-holdings.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Communication of policy commitments to stakeholder</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: See A.1.2.a</li> <li>• Met: Steps to communicate policy commitments to supply chain: The Company states in its Supplier Code of Conduct: 'In order to realize a sustainable supply chain, the Asahi Group requires our suppliers, their upstream suppliers and their subcontractors to act in accordance with the Asahi Group Supplier Code of Conduct. In addition, we ask for their understanding of the Asahi Group Code of Conduct, the Asahi Group Human Rights Principles, and the Asahi Group Environmental Principles.' In addition, it reports that it conducts a Supplier CSR Survey every three years that review human rights following the Supplier Code of Conduct contents. [Sustainable Procurement Principles and Code of Conduct, N/A: <a href="http://asahigroup-holdings.com">asahigroup-holdings.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Requires suppliers to communicate policy requirements</li> <li>• Met: How HR commitments made binding/contractual: The Company states on its website: 'The Asahi Group selects new suppliers by comprehensively assessing opportunity &amp; risk of items such as quality, price, delivery dates, and supply stability as well as the supplier's technology, stance on compliance and the environment, and respect for human rights. Upon the initiation of dealings, the Group explains the Asahi Group Supplier Code of Conduct to the suppliers and asks them to comply with it, and then concludes a trade contract agreement clearly prescribing compliance with the relevant laws'. In addition, it indicates in its Sustainability Data Book 2021: 'In 2020, to encourage our suppliers to address human rights issues, we included compliance with the Modern Slavery Act and Supplier Code of Conduct in our standard contracts with all suppliers, as well as an agreement to have the right to terminate the contract in the event of breach of our policies'. [Cooperation with Suppliers, N/A: <a href="http://asahigroup-holdings.com">asahigroup-holdings.com</a>] &amp; [Sustainability Data Book 2021, 06/2022: <a href="http://asahigroup-holdings.com">asahigroup-holdings.com</a>]</li> <li>• Not Met: Company requires suppliers to cascade down to their suppliers</li> </ul>
B.1.5	Training on Human Rights	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: Scores at least 1 on A.1.2.a: See indicator A.1.2.a</li> <li>• Met: How workers are trained on HR policy commitments: The Company states on its Human Rights Principles website section: 'we avoid committing or contributing to human rights infringements, and work to redress any such infringements should they occur, by [...] , and by providing training and education on respect for human rights to all employees. [...] the Principles are published on our website in 17 different languages, in order to promote understanding among our stakeholders.' In addition, on its 'Our Human Rights due diligence process' website, it indicates: 'We are implementing training for employees in order to instill the principles of this Code of Conduct and the Asahi Group Human Rights</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Principles'. [Human Rights Principles (modified on Jun 2022), 03/2021: <a href="https://asahigroup-holdings.com">asahigroup-holdings.com</a>] &amp; [Our Due Diligence process, N/A: <a href="https://asahigroup-holdings.com">asahigroup-holdings.com</a>]</p> <ul style="list-style-type: none"> <li>• Met: Trains relevant managers including procurement: The Company reports on its website: 'In 2020, we conducted human rights training for the managers and leaders of procurement departments at operating companies in Japan, and also provided e-learning programs for procurement department personnel both in Japan and internationally (176 people eligible; 100% attendance rate)'. [Our Due Diligence process, N/A: <a href="https://asahigroup-holdings.com">asahigroup-holdings.com</a>]</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>• Met: Meets both requirements under score 1</li> <li>• Met: Trains suppliers to meet company's HR commitment: In addition, it indicates: 'We sent training materials on sustainable procurement initiatives and global ESG trends including human rights, to all 900 of our continuous primary suppliers in Japan and internationally, enabling them to further their understanding of the Human Rights Principles and Supplier Code of Conduct. We also had them submit their opinions on these materials to serve as a reference point for future policies and responses'. [Our Due Diligence process, N/A: <a href="https://asahigroup-holdings.com">asahigroup-holdings.com</a>] &amp; [Sustainability Data Book 2021, 06/2022: <a href="https://asahigroup-holdings.com">asahigroup-holdings.com</a>]</li> <li>• Not Met: Disclose % trained: As indicated above, the training material was sent 'to all 900 of our continuous primary suppliers'. However, it is not clear the proportion of total suppliers trained. [Our Due Diligence process, N/A: <a href="https://asahigroup-holdings.com">asahigroup-holdings.com</a>] &amp; [Sustainability Data Book 2021, 06/2022: <a href="https://asahigroup-holdings.com">asahigroup-holdings.com</a>]</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>• Met: Scores at least 1 on A.1.2.a: See A.1.2.a</li> <li>• Not Met: Monitoring implementation of HR policy commitments across global ops and supply chain: The Company indicates that 'In cooperation with its suppliers, the Asahi Group engages in procurement to preserve the global environment and local communities, in accordance with the Asahi Group Sustainable Procurement Principles. We conduct a Supplier CSR Questionnaire to gain an understanding of all suppliers' ESG [...] initiatives, to assess their risks and to resolve potential issues. We require our suppliers to submit a Questionnaire [...] When deciding on where to conduct the interviews [on-site-monitoring], we prioritize raw and packaging material makers and make selections based on four criteria: (1) CSR Questionnaire score, (2) value of transactions with the Asahi Group, (3) The supplier attended an Asahi Group Procurement Policy Information Meeting, and (4) CSR risk.' On the other hand, on the Respect for Human Rights section it indicates: 'As part of its initiatives to ensure respect for human rights, the Board of Directors at Asahi Group Holdings, Ltd. takes supervisory responsibility, and has specified its role (under the Asahi Group Human Rights Principles) of performing regularly monitoring of the state of compliance with the Principles, and the progress of related initiatives.' In addition, in the Internal Audit Principles section, it indicates: 'Internal audit is aligned with organizational objectives and supports the Asahi Group to achieve corporate philosophy, vision and goals. The mission of internal audit is to provide objective assurance, advice and insight to enhance and preserve corporate values through a risk-based approach. Internal audit independently considers and evaluates the effectiveness of risk management, controls, and governance processes using a systematic, disciplined approach, and provides advice and support to continuously improve processes.' However, no further information about human rights audits/monitoring process was found. [Sustainability Data Book 2021, 06/2022: <a href="https://asahigroup-holdings.com">asahigroup-holdings.com</a>] &amp; [Internal Audit Principles, N/A: <a href="https://asahigroup-holdings.com">asahigroup-holdings.com</a>]</li> <li>• Met: Proportion of supply chain monitored: The Company discloses information about its Supplier CSR Survey on its website: 'The 2020 survey covers all direct material suppliers, both Japan and international, that regularly do business with us. Sixty-seven percent of the suppliers are from Japan, 22% are from Europe and Oceania and 11% are from Southeast Asia.' It reports that 681 primary suppliers out of 811 responded (84%'. [Sustainability Data Book 2021, 06/2022: <a href="https://asahigroup-holdings.com">asahigroup-holdings.com</a>]</li> <li>• Not Met: Describe how workers are involved in monitoring</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Score of 2 on A.1.2.a: See A.1.2.a</li> <li>• Met: Describes corrective action process: In addition, the Company reports: 'If the on-site survey revealed that a particular issue was not being adequately addressed, we provided suppliers with examples of how other companies are dealing with the issues or suggested consulting a labor and social security attorney, legal advisor, or</li> </ul>



Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>a Labor Standards Inspection Office about relevant laws and regulations. In such ways, we are working together with suppliers to develop action plans.' Moreover, in its Sustainable Procurement Principles it indicates: 'If an act that deviates from the Asahi Group Supplier Code of Conduct is confirmed, it will be promptly improved. If there is no improvement and significant deviations continue, the transaction may be reconsidered.' [Sustainability Data Book 2021, 06/2022: <a href="http://asahigroup-holdings.com">asahigroup-holdings.com</a>] &amp; [Sustainable Procurement Principles and Code of Conduct, N/A: <a href="http://asahigroup-holdings.com">asahigroup-holdings.com</a>]</p> <ul style="list-style-type: none"> <li>• Not Met: Disclose findings and number of corrective action: The Company states that after conducting supplier CSR survey, We visited five companies in 2018 and 12 companies in 2019 for on-site monitoring based on the Supplier CSR Questionnaire. Monitoring confirmed that most items perceived as problem areas in the questionnaire were, in fact, being addressed in one way or another. In 2020, we planned to visit 12 companies, but were unable to do so due to the travel restrictions associated with COVID-19. [...] In 2019, the following issues were identified: Cases in which working environment measurements may not be compliant with the Ordinance on Industrial Safety and Health: 5 cases concerning noise and 3 cases concerning illumination. We suggested that the supplier consult a labor and social security attorney, legal advisor, or a Labor Standards Inspection Office.[...]' In addition, in its Sustainability Data Book, the Company reports: 'In 2021, the following three issues were identified by many suppliers: (1) No employee training on working conditions, compliance, or information security: 9 companies. (2) The structure and responsibilities of each department were not clear: 8 companies. (3) Efforts to prevent drunk driving and alcohol harassment were not being made: 7 companies.' Although the Company discloses information about the average score rate of its Supplier CSR Survey, it is not clear the number of corrective actions taken as a result of the monitoring. [Sustainability Data Book 2021, 06/2022: <a href="http://asahigroup-holdings.com">asahigroup-holdings.com</a>]</li> </ul>
B.1.7	Engaging and terminating business relationships	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: HR affects selection of suppliers</li> <li>• Not Met: HR affects on-going supplier relationships: In its Sustainable Procurement Principles it indicates: 'If an act that deviates from the Asahi Group Supplier Code of Conduct is confirmed, it will be promptly improved. If there is no improvement and significant deviations continue, the transaction may be reconsidered.' However, it is not clear whether the business relationship could be terminated. [Sustainable Procurement Principles and Code of Conduct, N/A: <a href="http://asahigroup-holdings.com">asahigroup-holdings.com</a>]</li> </ul> <p>Score 2</p> <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: The Company indicates in its Sustainability Data Book 2021: 'In the Asahi Group Supplier Code of Conduct, we call upon suppliers to respect human rights, including to “not discriminate against, commit any act that damages the dignity of any individual or engage in any harassment” “ensure safe and healthy work environment,” “eliminate forced labor,” “abolish child labor effectively,” and “uphold their human rights responsibility in the communities in which they do business.” We also required our primary suppliers of raw and packaging materials to provide a statement of consent to our new Code of Conduct.' However, no further information describing how the Company works proactively with suppliers to meet human rights requirements was found. [Sustainability Data Book 2021, 06/2022: <a href="http://asahigroup-holdings.com">asahigroup-holdings.com</a>]</li> </ul>
B.1.8	Approach to engagement with 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 to identify and engage with workers/communities in the last two years</li> <li>• Not Met: Discloses stakeholders that HRs may be affected</li> <li>• Met: Provides two examples of engagement with stakeholders: The Company indicates in its Integrated Report 2020: 'Based on the results of a gap analysis that we conducted in 2019, we discovered that issues related to foreign technical interns in terms of forced labor among employees in Japan pose a high level of risk and, accordingly, should be addressed with priority. To that end, we conducted a labor conditions survey at the Okayama Plant of Asahi Group Foods, Ltd., which accepts foreign technical interns, based on Group data pertaining to the number of non-regular foreign workers and foreign technical interns working at all Group companies in Japan. This investigation was carried out in collaboration with The Global Alliance for Sustainable Supply Chain (ASSC) and involved a labor conditions survey of 40 technical interns and native-language interviews with these interns.'</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>The investigation yielded an overall positive evaluation, finding that there was interest among interns in the Technical Intern Training program and that their living environment was sound. [...]'. In addition, in its Sustainability Data Book 2021, the Company reports: 'In 2021, we conducted workplace environment surveys for Asahi Breweries, Ltd., Asahi Soft Drinks, Ltd., and Asahi Group Foods, Ltd. to understand and resolve the needs and issues faced by non-union employees (contract and temporary employees), who are vulnerable stakeholders in the company. Although no risks could lead to serious human rights violations were found in the survey, the three targeted companies have identified issues from the survey results and are working to make improvements. Toward reduction in human rights risks, we continue to work on it every other year as a guideline'. [Integrated Report 2020, 2021: <a href="http://asahigroup-holdings.com">asahigroup-holdings.com</a>] &amp; [Sustainability Data Book 2021, 06/2022: <a href="http://asahigroup-holdings.com">asahigroup-holdings.com</a>]</p> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Analysis of stakeholder views on company's HR issues: The Company presents an overview of Potential Human Rights Risks Identified in the Surveys made to relevant stakeholders in its Integrated Report 2021: 'There is a possibility of child labor due to the large number of small-scale farmers, such as family businesses, and the fact that there are often no schools in rural areas where farmland is located; In general, agricultural workers have low incomes, making them vulnerable to poverty-related human rights; Gender disparity represented by low wages, etc., and various forms of harassment against women may occur; In Ethiopia, there is a high risk of human rights violations caused by conflict; The working conditions of day laborers at the time of coffee bean harvesting may not be appropriate; In general, there is a possibility of health hazard risks to workers due to pesticides and chemical fertilizers'. [Integrated Report 2021, 2022: <a href="http://asahigroup-holdings.com">asahigroup-holdings.com</a>]</li> <li>• Met: Describe how views influenced company's HR approach: In addition, in its Sustainability Data Book 2021, the Company reports: 'In 2020, together with ASSC, we conducted a labor conditions survey and interviews with 40 technical interns in their native language at the Okayama Plant of Asahi Group Foods, Ltd., which accepts foreign technical intern trainees. We carried out improvement activities based on the findings by the ASSC in 2021. Examples of areas for improvement are as follows: 1: Posting notices and creation of cards with emergency contact information and dormitory addresses [...]; 2: Posting notices about sanitary management precautions and company regulations in the native language [...]; 3: Posting notices in the operation of equipment in the native language [...]; 4: Lending of learning materials to help trainees improve their Japanese language skills'. [Sustainability Data Book 2021, 06/2022: <a href="http://asahigroup-holdings.com">asahigroup-holdings.com</a>]</li> </ul>

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.1	Identifying 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: The Company is 'undertaking efforts to identify human rights risks facing our supply chain and employees'. It provides a description of the preparations it has made since 2018, which include 'Identify human rights issues in the industry', 'Evaluate significance of human rights risks', 'Conduct survey and gap analysis of current situation', 'Formulate action plan for human rights risks', 'Establish Asahi Group Human Rights Principles', and 'Commence human rights due diligence'. The Company discloses a chart on its report showing activities carried out at different stages. [2019 Integrated Report, 07/2020: <a href="http://asahigroup-holdings.com">asahigroup-holdings.com</a>]</li> <li>• Met: Identifying risks through relevant business relationships: See above [2019 Integrated Report, 07/2020: <a href="http://asahigroup-holdings.com">asahigroup-holdings.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: Describe ongoing global risk identification in consultation with stakeholder/HR experts: As indicated above, this process has been implemented since 2018. In addition, the Company reports in its Sustainability Data Book 2021: 'Furthermore, in 2021, we participated in the " Stakeholder Engagement Program" hosted by the Caux Roundtable Japan, where we held dialogues with non-governmental organizations (NGOs), non-profit organizations (NPOs) and experts, and participated in the formulation of important human rights issues for each industry. Based on the results of these activities, we will enhance the effectiveness of the human rights due diligence process in the Asahi Group in the future. [...] In 2021, we invited experts to hold a dialogue on human rights with the CEO, CAO, and CHRO of Asahi Group Holdings, Ltd. The purpose was to provide opportunities to have a realistic image of the possible problems as a global company, consider what management decisions would be necessary when as such problems occur, and to deepen understanding of business and human rights. Experts mentioned the essentials of "business and human rights," such as the attitude and approaches to respecting human rights required of companies and top management. In response to the dialogues, discussions are held at the Corporate Strategy Board few times to enhance the effectiveness of the Human Rights Principles.' It also reports: 'In 2021, the Asahi Group conducted a global-wide engagement survey for the first time, with 25,416 employ-ees (87% response rate) completing the survey. Based on the survey results, companies within Asahi Group identified problems and implemented corrective actions to improve and increase employee engagement'. See B.1.8 for additional information on affected stakeholder engagement. [2019 Integrated Report, 07/2020: <a href="http://asahigroup-holdings.com">asahigroup-holdings.com</a>] &amp; [Sustainability Data Book 2021, 06/2022: <a href="http://asahigroup-holdings.com">asahigroup-holdings.com</a>]</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	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>• Not Met: Describe process for assessment of HR risks and discloses salient HR issues: The Company conducted theoretical analysis of modern slavery risk in 17 countries where its manufacturing plants are located, covering 11 of the key raw ingredients it procures. The results of the analysis indicated that modern slavery risk was 'very high' and 'high' at seven of the countries. 11 items were selected based on the level of assumed risk and procurement volume. The level of modern slavery risk differed according to the country or region. Analysis indicated that growing crops held the highest level of modern slavery risk in the value chain. In addition, in its Integrated Report 2020, it indicates: 'In 2017, the Asahi Group carried out an analysis of modern slavery risk. From the results of this analysis, we discovered that our coffee plantations in Ethiopia and Tanzania had the highest risk of modern slavery in terms of severity and level of impact. From 2021, we will work to ascertain the actual human rights conditions at suppliers of high-risk commodities through self-assessment questionnaires and other measures and also conduct field surveys of these suppliers. Through these means, we will identify modern slavery risk'. The Company also reports in its Sustainability Data Book 2021: 'Due to the difficulty of identifying upstream suppliers, we commissioned RightsDD Limited, a London-based human rights research organization, to conduct a human rights impact assessment by desk research on the coffee industry in Ethiopia and Tanzania. No details found, however, on description of human rights risk assessment beyond modern slavery. [Integrated Report 2020, 2021: <a href="http://asahigroup-holdings.com">asahigroup-holdings.com</a>] &amp; [Modern Slavery Risk Analysis, 15/03/2019: <a href="http://asahigroup-holdings.com">asahigroup-holdings.com</a>]</li> <li>• Not Met: How process applies to supply chain: See above. No details found beyond modern slavery context. [Integrated Report 2020, 2021: <a href="http://asahigroup-holdings.com">asahigroup-holdings.com</a>] &amp; [Modern Slavery Risk Analysis, 15/03/2019: <a href="http://asahigroup-holdings.com">asahigroup-holdings.com</a>]</li> <li>• Met: Public disclosure of the results of HR assessment: 'The Company recognizes that addressing human rights issues linked to business operations constitutes an important element in fulfilling human rights responsibilities and has set eight issues as important human rights issues: Discrimination; Harassment; Forced Labor and Child Labor; Freedom of Association and the Right to Collective Bargaining; Occupational Health and Safety; Working Hours and Wages; Impacts within the Supply Chain; and Impacts on Local Communities'. [Human Rights Principles - web, N/A: <a href="http://asahigroup-holdings.com">asahigroup-holdings.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Meets all requirements under score 1</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Met: How it involved affected stakeholders in the assessment: The Company reports in its Sustainability Data Book 2021: 'In order to collect information reflecting a more realistic situation, we conducted interviews with related stakeholders. We also asked importers and exporters to respond to the Supplier CSR Questionnaire to understand the status of their ESG initiatives based on the Supplier Code of Conduct. As a result, it was found that each stakeholder is aware of human rights risks inherent in the coffee industry and is working on the following initiatives. [...] Stakeholders interviewed: Import Trading Company - Major customers of the Asahi Group importing coffee beans; [...] Exporters - Companies transporting coffee beans to import trading companies (one company each from Ethiopia and Tanzania); [...] Rainforest Alliance - NGOs that provide certification for sustainable agricultural products and support for farmers in terms of conservation of the natural environment and human rights'. It also reports that 'The Asahi Group considers it important to ascertain the needs of vulnerable stakeholders, in order to identify internal human rights risks and prevent and correct human rights violations. In 2021, we conducted workplace environment surveys for Asahi Breweries, Ltd., Asahi Soft Drinks, Ltd., and Asahi Group Foods, Ltd. to understand and resolve the needs and issues faced by non-union employees (contract and temporary employees), who are vulnerable stakeholders in the company. Although no risks could lead to serious human rights violations were found in the survey, the three targeted companies have identified issues from the survey results and are working to make improvements. Toward reduction in human rights risks, we continue to work on it every other year as a guideline'. [Sustainability Data Book 2021, 06/2022: <a href="http://asahigroup-holdings.com">asahigroup-holdings.com</a>]</li> </ul>
B.2.3	Integrating and acting on human rights risks and impact assessments	1	<p>The individual elements of the assessment are met or not as follows: Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Action Plans to mitigate risks: The Company indicates on its website: 'When formulating the Asahi Group Human Rights Principles, we identified eight key human rights issues to be tackled in the course of our business activities. Subsequent gap analysis and best practice case studies on these eight issues revealed the high importance of responding to human rights risks in the "supply chain" and among "Asahi Group employees," and the need for "development of a framework for remedy to victims of human rights violation." The following three high-priority areas have thus been identified, and work is underway on the formulation and implementation of concrete action plans for the short and medium terms.' In addition, it details the plan for human rights due diligence. For its own operations, its Action Plan 2020-2021 includes the following sections: 'Activities to Prevent the Use of Forced Labor [...] Realizing Freedom of Association [...]. However, it is not clear if action plans to mitigate risks are being carried out in a systematic way or only the issues mentioned. Seems to be a work in progress. [Our Due Diligence process, N/A: <a href="http://asahigroup-holdings.com">asahigroup-holdings.com</a>]</li> <li>• Not Met: Description of how global system applies to supply chain: As of 2022, the Company presents its Plan 2020-2022 in Supply Chain, including: Revising the Asahi Group Supplier Code of Conduct [...] Implementing Human Rights Training [...] Implementing the Human Rights Due Diligence Process [...]. However, the implementation of its due diligence process is still a work in progress, no risk-based approach plan to mitigate risks and impacts was found.</li> <li>• Met: Example of actions decided on at least 1 salient HR issues: With respect its activities to prevent the use of forced labour, the Company indicates: 'We have conducted checks for the employment of non-regular foreign workers and foreign technical interns by all group companies in Japan. In 2020, together with ASSC, we conducted a labor conditions survey and native-language interviews with 40 technical interns at the Okayama Plant of Asahi Group Foods, Ltd., which accepts foreign technical interns. This investigation yielded positive overall evaluations, finding that there was interest among the interns in the Technical Intern Training Program and that their living environment was sound. Improvements to be made in the future include the posting of notices in employees' native languages on matters such as internal regulations and precautions within the plant, and education on emergency response procedures. Moreover, we will work to address problems that cannot be solved by the company alone, through channels such as the Japan Platform for Migrant Workers towards Responsible and Inclusive Society.'</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: In addition, the Company reports in its Data Book 2021: 'The Asahi Group considers it important to ascertain the needs of vulnerable stakeholders, in order to identify internal human rights risks and prevent and correct human rights violations. In 2021, we conducted workplace environment surveys for Asahi Breweries, Ltd., Asahi Soft Drinks, Ltd.,</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			and Asahi Group Foods, Ltd. to understand and resolve the needs and issues faced by non-union employees (contract and temporary employees), who are vulnerable stakeholders in the company. Although no risks could lead to serious human rights violations were found in the survey, the three targeted companies have identified issues from the survey results and are working to make improvements. Toward reduction in human rights risks, we continue to work on it every other year as a guideline'. It is not clear, if affected stakeholders are being consulted in relation to decisions about actions taken. [Sustainability Data Book 2021, 06/2022: <a href="http://asahigroup-holdings.com">asahigroup-holdings.com</a> ]
B.2.4	Tracking the effectiveness of actions to respond to human rights risks and impacts	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Not Met: System for tracking or monitor if actions taken are effective: The Company's PDCA plan suggests that it is currently in the phase of taking action in the supply chain. Part of this includes to 'Track and examine the effects of efforts to address human rights risks'. However, these seem to be forward looking statements, and no evidence could be found of a system to track if actions are effective as of date. No further evidence found in latest report. The Company has provided additional comment/source to CHRB regarding this indicator. However, evidence was not material. [2019 Integrated Report, 07/2020: <a href="http://asahigroup-holdings.com">asahigroup-holdings.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Not Met: Lessons learnt from checking system effectiveness</li> </ul> Score 2 <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	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Not Met: Provides two examples of comms with stakeholders: The Company has provided additional comment/source to CHRB regarding this indicator. However, evidence was not material.</li> </ul> Score 2 <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	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Met: Channel accessible to all workers: The Company 'currently offers a consultation service regarding human rights. It comprises two whistle-blowing systems: a Clean Line System for employees, and a Procurement Clean Line System for suppliers. Opinions concerning human rights are also fielded through the acceptance of inquiries made through the Asahi Group Holdings, Ltd. Website.' [Consultation Service on Human Rights, N/A: <a href="http://asahigroup-holdings.com">asahigroup-holdings.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Not Met: Channel is available in all appropriate languages and workers aware: The Company indicates on its website section 'Compliance promotion': 'Our Regional Headquarters have established contact points for internal reporting, and are dealing with matters reported as appropriate in the local languages used by local employees.' In addition, in its Sustainability Data Book 2021, it reports: 'With the aim of enhancing employees' awareness and understanding of the Asahi Group's Clean Line System and eliminating compliance and human rights violations, we disseminate a "Clean Line Report" to Group employees in Japan every year. The report provides a variety of information to enhance the transparency of the system, such as actions taken under the Clean Line System (consultation service, the process implemented after the receipt of a complaint, the time required for an investigation, etc.); concrete cases of non-compliance reports (including investigation findings and corrective measures taken), in which greatest attention is paid to the protection of whistle-blowers; and important points about whistle-blowing'. it is not clear, however, if people are made aware of the channels globally, as communications seem to refer to employees in Japan. [Sustainability Data Book 2021, 06/2022: <a href="http://asahigroup-holdings.com">asahigroup-holdings.com</a>] &amp; [Compliance promotion, N/A: <a href="http://asahigroup-holdings.com">asahigroup-holdings.com</a>]</li> </ul>



Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Not Met: Describe how workers in the supply chain have access to grievance mechanism: The Company states that 'the Procurement Clean Line System enables our suppliers and parties wishing to become our suppliers to report incidents where employees of the Asahi Group act in a manner contrary to the Asahi Group Basic Procurement Policies, or when they are involved in activities that appear not to comply with the law or social ethics'. In addition, the Company indicates in a document in its Procurement Clean Line System website (more information) that Suppliers and their employees are eligible applicants of this line. However, in its Sustainability Data Book 2021, it indicates: 'In Europe and Oceania, the scope of the whistle-blowing system has been expanded to include suppliers.', so it is not clear whether supplier workers worldwide have access to the Company's grievance mechanism. [Promotion of CSR Procurement, N/A: <a href="http://asahigroup-holdings.com">asahigroup-holdings.com</a>] &amp; [Procurement Clean Line - More information, N/A: <a href="http://asahibeer.co.jp">asahibeer.co.jp</a>]</li> <li>• Not Met: Expect Suppliers to convey expectation to their own suppliers</li> </ul>
C.2	Grievance channel(s)/mechanism(s) to receive complaints or concerns from external individuals and communities	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Grievance mechanism for community: The Company states that it has customer survey channel using postcards and also a website section for customer's 'Comments or questions'. However, it is not sufficient as evidence for this indicator. Additionally, 'The Asahi Group is currently exploring the development of relief mechanisms open to all Group employees as well as suppliers and other stakeholders in society'. However, it is unclear if this is already available to communities where the Company operates. In addition, the Company indicates in its Sustainability Data Book 2021: 'In Japan, opinions concerning human rights are also fielded through the acceptance of inquiries made through the Asahi Group Holdings, Ltd. website. Strict confidentiality and anonymity will be maintained with respect to the information provided.' However, it is not clear whether this statement applies to the whole group or only in Japan operations. [Consultation Service on Human Rights, N/A: <a href="http://asahigroup-holdings.com">asahigroup-holdings.com</a>] &amp; [Sustainability Data Book 2021, 06/2022: <a href="http://asahigroup-holdings.com">asahigroup-holdings.com</a>]</li> </ul> <p>Score 2</p> <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	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Engages users to create or assess system</li> <li>• Not Met: Examples (at least two) of how they do this</li> </ul> <p>Score 2</p> <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	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Response timescales and how complainants will be informed: The Company indicates: 'If there is an request to feedback in the case of a registered report is filed, the whistleblower will be informed of the outcomes'. However, no information about response timescales or how the whistleblower will be informed was found. [Procurement Clean Line - More information, N/A: <a href="http://asahibeer.co.jp">asahibeer.co.jp</a>]</li> <li>• Not Met: Describe support (technical, financial,etc) available for equal access by complainants</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <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	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: Public statement prohibiting retaliation: The Company states in its Human Rights Principles: 'Employees or interested stakeholders who report or notify possible breaches will not be disadvantaged in any way. On the contrary, their reports and notifications will be well received as an opportunity for us to increase the transparency of Asahi Group's business activities, and help strengthen the mutual trust we have with our stakeholders'. However, no statement prohibiting retaliation against workers and other stakeholders (including those that represent them) for raising human rights related complaints or concerns was found. In addition, according to Asahi Beverage Human Rights Policy: 'We expect that anyone involved with our business will report known or suspected violations of applicable laws, regulations, policies, and our ethical standards. We also expect our suppliers to create processes for raising grievances. In accordance with our</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Whistleblower Policy and Procedure, retaliation for raising these concerns is strictly prohibited'. However, this policy applies only 'to all employees in the Asahi Beverages Regional Hub and its following Business Divisions: Asahi Lifestyle Beverages; Asahi Beverages New Zealand; and Carlton &amp; United Breweries', it is not clear whether this policy applies to the whole group or only Asahi Beverage Oceania operations. [Human Rights Principles (modified on Jun 2022), 03/2021: <a href="http://asahigroup-holdings.com">asahigroup-holdings.com</a>] &amp; [Human Rights Policy - Oceania, 11/2021: <a href="http://asahi.com.au">asahi.com.au</a>]</p> <ul style="list-style-type: none"> <li>• Met: Practical measures to prevent retaliation: With respect its grievances mechanisms, the Company indicates on its website: 'Strict confidentiality and anonymity will be maintained with respect to the information provided'. [Consultation Service on Human Rights, N/A: <a href="http://asahigroup-holdings.com">asahigroup-holdings.com</a>]</li> <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	<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: Complainants not asked to waive rights: The Company indicates in its 'Procurement Clean Line System - information' document: 'Your request will not adversely affect your business dealings at all. It does not preclude the legal right of the allegations, and the whistleblower can exercise the legal rights and take legal or administrative action.' However, it is not clear whether this policy applies to all whistleblowers, as this is a hotline focused only in suppliers. [Procurement Clean Line - More information, N/A: <a href="http://asahibeer.co.jp">asahibeer.co.jp</a>]</li> <li>• Not Met: Company does not require confidentiality provisions</li> </ul> <p>Score 2</p> <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	0.5	<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: Describes how remedy has been provided: The Company indicates on its website: 'Activities to Remedy the Problems Identified: We investigated the information provided by whistle-blowers. Once a violation of compliance was confirmed, we took action to remedy the problem. When there was still room for improvement in matters other than non-compliance, we took necessary measures to respond to such matters. Whistle-blowing reports that require actions to remedy the problems or improvements are also reported to and discussed by auditors and the Compliance Committee of the Asahi Group.' However, no description of a process to provide remedy to specific human rights breaches was found. [Consultation Service on Human Rights, N/A: <a href="http://asahigroup-holdings.com">asahigroup-holdings.com</a>]</li> <li>• Not Met: Says how it would provide remedy for victims if no adverse impact identified</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Changes to systems, processes and practices to stop similar impact: The Company reports on its website: 'With the aim of enhancing employees' awareness and understanding of the Asahi Group's Clean Line System and eliminating compliance and human rights violations, we disseminate a "Clean Line Report" to Group employees in Japan every year. The report provides a variety of information to enhance the transparency of the system, such as actions taken under the Clean Line System (consultation service, the process implemented after the receipt of a complaint, the time required for an investigation, etc.); concrete cases of non-compliance reports (including investigation findings and corrective measures taken), in which greatest attention is paid to the protection of whistle-blowers; and important points about whistle-blowing. We conduct a compliance survey on an anonymous basis involving major Group companies once a year to learn their awareness of the Clean Line System (including how to use it) and their intention to use the system. Based on survey findings, we identify the issues to address to ensure compliance, including human rights, develop improvement plans, and implement them at each operating company. With regard to harassment, which is the highest in the number of cases reported, in fiscal 2020 we are providing human resources and general affairs personnel of Group companies with training while strengthening individual companies' efforts to prevent harassment.' [Consultation Service on Human Rights, N/A: <a href="http://asahigroup-holdings.com">asahigroup-holdings.com</a>]</li> <li>• Not Met: Describe approach to monitoring implementation of agreed remedy: The Company indicates on its website: 'The Asahi Group established the Asahi Group Ethics/Compliance Policies to promote compliance management. Based on the Policies, we clarify our internal system and operation and promote fair and highly transparent business activities founded on compliance in the broad sense of</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>the term, going beyond the observance of laws and regulations. The Asahi Group established its Compliance Committee as the highest-order organ to deliberate on compliance. The Committee consists of directors, the head of Legal Section, and other persons of Asahi Group Holdings appointed separately by the Committee. It monitors and works to improve awareness of the Asahi Group Code of Conduct and operation of the Clean Line System (whistle-blowing system) to raise the efficacy of compliance promotion activities'. However, it is not clear whether this Committee also monitors the implementation of agreed remedy actions, as the information focused on awareness and promotion activities. [Compliance promotion, N/A: <a href="http://asahigroup-holdings.com">asahigroup-holdings.com</a>]</p> <ul style="list-style-type: none"> <li>• Not Met: Approach to learning from incident to prevent future impacts</li> </ul>
C.8	Communication on the effectiveness of grievance mechanism(s) and incorporating lessons learned	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Number grievances filed, addressed or resolved and outcome achieved: The Company reported: 'In fiscal 2019, through the Clean Line System for Group employees in Japan, 33 reports were made concerning human rights-related harassment and bad behaviors'. In addition, the Company indicates in its Sustainability Data Book 2021: 'We investigated the information provided by whistle-blowers. Once a violation of compliance was confirmed, we took action to remedy the problem. When there was still room for improvement in matters other than non-compliance, we took necessary measures to respond to such matters' However, no further information with respect the number of grievances addressed or resolved was found, including figures for different stakeholders company wide. [Consultation Service on Human Rights, N/A: <a href="http://asahigroup-holdings.com">asahigroup-holdings.com</a>] &amp; [Sustainability Data Book 2021, 06/2022: <a href="http://asahigroup-holdings.com">asahigroup-holdings.com</a>]</li> <li>• Not Met: How lessons from mechanism improve management system</li> </ul> <p>Score 2</p> <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	<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: Discloses timebound target for suppliers to pay living wage or include in code or contracts: In its Human Rights Principles, the Company states that 'we will work towards ensuring wages that enable our employees to meet their basic needs of living'. However, it is not included in the Supplier Code of Conduct that reads: 'Suppliers should comply with all applicable laws and regulations related to working hours and wages, especially to minimum wages, of the countries and regions where they do business' No evidence found on living wage. [Sustainable Procurement Principles and Code of Conduct, N/A: <a href="http://asahigroup-holdings.com">asahigroup-holdings.com</a>] &amp; [Human Rights Principles (modified on Jun 2022), 03/2021: <a href="http://asahigroup-holdings.com">asahigroup-holdings.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: 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	<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 (purchasing practices): The Company states that 'we will provide fair and just opportunities to the Suppliers both at home and abroad, regardless of the scale of a company'. However, there is no description about its measurement to avoids business model pressure on human rights related to purchasing practices. [Sustainable Procurement Principles and Code of Conduct, N/A: <a href="http://asahigroup-holdings.com">asahigroup-holdings.com</a>]</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</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: Examples of how it assessed, addressed and change purchasing practices</li> </ul>
D.1.3	Mapping and disclosing the supply chain	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Identifies direct and indirect suppliers back to manufacturing sites (factories or fields)</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Discloses names and locations of significant parts of SP and why</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <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	<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: Child Labour rules in codes or contracts: The Company's Supplier Code indicates: 'Suppliers should abolish child labor effectively.' However, 'should abolish' is not considered a formal prohibition requirement. In addition, no requirements related to verifying the age of workers recruited nor to remediation programmes were found in contractual arrangements with suppliers or supplier code of conduct. [Sustainable Procurement Principles and Code of Conduct, N/A: <a href="http://asahigroup-holdings.com">asahigroup-holdings.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: How working with suppliers on child labour</li> <li>• Not Met: Assessment 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	<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: Debt and fees rules in codes or contracts: The Company's Supplier Code indicates: 'Suppliers should eliminate forced labor'. However, 'should eliminate' is not considered a formal prohibition requirement. In addition, no provision prohibiting financial burdens on job seekers and workers by collecting recruitment fees or related costs were found in contractual arrangements with suppliers or supplier code of conduct. [Sustainable Procurement Principles and Code of Conduct, N/A: <a href="http://asahigroup-holdings.com">asahigroup-holdings.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: How working with suppliers on debt &amp; fees</li> <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	<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: 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> <p>Score 2</p> <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	<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: Free movement rules in codes or contracts: The Company's Supplier Code indicates: 'Suppliers should eliminate forced labor.' However, no further requirements were found, including provisions related to freedom of movement in contractual arrangements with suppliers or supplier code of conduct. [Sustainable Procurement Principles and Code of Conduct, N/A: <a href="http://asahigroup-holdings.com">asahigroup-holdings.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: How working with suppliers on free movement</li> <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>
D.1.6.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: The Company indicates in its Supplier Code of Conduct: 'Suppliers should respect the freedom of association and the right to collective bargaining in accordance with the applicable laws and regulations of the countries and regions where they do business'. However, 'should respect' is not considered a formal commitment requirement. In addition, no provision prohibiting intimidation, harassment, retaliation and violence against trade union members and trade union representatives was found in contractual arrangements with suppliers or supplier code of conduct. [Sustainable Procurement Principles and Code of Conduct, N/A: <a href="http://asahigroup-holdings.com">asahigroup-holdings.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: How working with suppliers on FoA and CB</li> <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>

Indicator Code	Indicator name	Score (out of 2)	Explanation
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: The Company indicates in its Supplier Code: 'Suppliers should ensure safe and healthy work environment'. No further evidence found on clear requirements regarding health and safety. In addition, 'should ensure' is not considered a formal requirement. [Sustainable Procurement Principles and Code of Conduct, N/A: <a href="http://asahigroup-holdings.com">asahigroup-holdings.com</a>]</li> <li>• Not Met: Injury Rate or Lost days or Near miss disclosures for last reporting period</li> <li>• Not Met: Fatalities rate for lasting reporting period</li> <li>• Not Met: Occupation disease rate for last reporting period</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: How working with suppliers on H&amp;S</li> <li>• Not Met: 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 15.84 out of 80 points scored in themes A-D has been applied to produce a score of 3.96 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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