

**Company Name** Brown-Forman Corporation  
**Industry** Agricultural Products (Supply Chain only)  
**Overall Score** 3.6 out of 100

Theme Score	Out of	For Theme
0.8	10	A. Governance and Policies
0.0	25	B. Embedding Respect and Human Rights Due Diligence
1.5	20	C. Remedies and Grievance Mechanisms
0.6	25	D. Performance: Company Human Rights Practices
0.7	20	E. Performance: Responses to Serious Allegations

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

Please note also that the "Not met" labels in the Explanation boxes below do not necessarily mean that the company does not meet the requirements as they are described in the bullet point short text. Rather, it means that the analysts could not find information *in public sources* that met the requirements *as described in full* in the CHRB 2022 Methodology document for the sector concerned. For example, a "Not met" under "General HRs Commitment", which is the first bullet point for indicator A.1.1, does not necessarily mean that the company does not have a general commitment to human rights. Rather, it means that the CHRB could not identify a public statement of policy in which the company commits to respecting human rights.

## Detailed assessment

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

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1.1	Commitment to respect human rights	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Met: General HRs commitment: The Company states 'our commitment to human rights is embodied throughout the companies policies and statements [...]'. [Global Human Rights Statement, 08/2021: <a href="#">brown-forman.com</a>] &amp; [Annual report, 20/06/2019: <a href="#">brown-forman.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Not Met: Commitment to the UNGPs</li> <li>Not Met: Commitment to the OECD Guidelines for Multinational Enterprises</li> </ul>
A.1.2.a	Commitment to respect the human rights of workers: ILO Declaration on Fundamental Principles and Rights at Work	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Not Met: Company has a commitment to the ILO Core</li> <li>Not Met: Company has a explicit commitment to All four ILO Core</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Not Met: Company expect suppliers to commit to ILO Core: The Supplier Guiding Principles states that 'with respect to Human Rights takes into consideration international labor standards set forth in the United Nations Universal Declaration of Human Rights as well as the eight fundamental International Labour Organization (ILO) conventions.' However, 'to take into consideration' is not considered a formal statement of commitment according to CHRB wording criteria. [Supplier Guiding Principles with respect to Human Rights, 17/03/2019: <a href="#">static.brown-forman.com</a>]</li> <li>Not Met: Company explicitly list All four ILO for suppliers: The company's Supplier Guiding Principles lists each of the ILO core labour standards, however, in regards to collective bargaining it is not clear whether the Company is requiring to respecting this right in all contexts, as it indicates 'form and join legally recognized</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			trade (collective bargaining) unions'. 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. [Supplier Guiding Principles with respect to Human Rights, 17/03/2019: <a href="http://static.brown-forman.com">static.brown-forman.com</a> ]
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>• Not Met: Commitment to respect H&amp;S of workers: The Company states in its Code of Conduct: 'We have policies and procedures in place designed to keep Brown-Forman injury-free, but a healthy and safe work environment requires a team effort'. However, no explicit, direct commitment found to employees health and safety. Previous evidence was based on a Human Rights statement that was no longer found. [Code of Conduct, 08/2021: <a href="http://brown-forman.com">brown-forman.com</a>]</li> <li>• Not Met: Respect ILO labour standards on working hours or Commits to 48 hours regular work week</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Expect suppliers to commit to H&amp;S of their workers: The Company indicates in its Supplier Code: 'We expect our supplier partners to comply with all laws related to workplace safety. Where national / local laws do not exist then responsible international standards are to be applied'. [Supplier Guiding Principles with respect to Human Rights, 17/03/2019: <a href="http://static.brown-forman.com">static.brown-forman.com</a>]</li> <li>• Not Met: Expect suppliers to commit to ILO labour standard or to 48 hours regular work week: With respect working hours, it indicates: 'Payment of fair wages in line with norms for the industry and market, and working hours that respect applicable legal norms. When overtime hours are required, every effort should be made to keep the number of hours reasonable within a given day or workweek, taking into consideration the impact on employees' health and safety.' 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. [Supplier Guiding Principles with respect to Human Rights, 17/03/2019: <a href="http://static.brown-forman.com">static.brown-forman.com</a>]</li> </ul>
A.1.3.a.AG	Commitment to respect human rights particularly relevant to the industry – land, natural resources and indigenous peoples' rights (AG)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Respect land ownership and natural resources as set out in VGGT</li> <li>• Not Met: Respect land ownership and natural resources as set out in The IFC Performance Standards</li> <li>• Not Met: Respecting indigenous peoples' rights or ILO Convention No.169 or UN Declaration</li> <li>• Not Met: Expecting suppliers to make these commitments</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Respecting the right to water</li> <li>• Not Met: Company's policy commits to obtain FPIC</li> <li>• Not Met: Expecting suppliers to make these commitments</li> </ul>
A.1.3.b.AG	Commitment to respect human rights particularly relevant to the industry – vulnerable groups (AG)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Women's rights</li> <li>• Not Met: Children's rights</li> <li>• Not Met: Migrant worker's rights</li> <li>• Not Met: Expects suppliers to respect at least one of these rights [Diversity Principles, Goals &amp; Objectives, 17/03/2019: <a href="http://static.brown-forman.com">static.brown-forman.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: CEDAW/Women's Empowerment Principles</li> <li>• Not Met: Child Rights Convention/Business Principles</li> <li>• Not Met: Convention on migrant workers</li> <li>• Not Met: Expecting suppliers to respect these rights</li> </ul>
A.1.4	Commitment to remedy	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: The Company commits to remedy</li> <li>• Not Met: Company expect suppliers to make this commitment</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Collaborating with other remedy initiatives</li> <li>• Not Met: Work with suppliers to remedy impact</li> </ul>
A.1.5	Commitment to respect the rights of human	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>

Indicator Code	Indicator name	Score (out of 2)	Explanation
	rights defenders		Score 2 • Not Met: Work with HRD to create safe and enabling environment

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.2.1	Commitment from the top	0	The individual elements of the assessment are met or not as follows: Score 1 • Not Met: Board level responsibility for HRs • Not Met: Describe HR expertise of Board member Score 2 • Not Met: Speeches/letters by Board members or CEO
A.2.2	Board responsibility	0	The individual elements of the assessment are met or not as follows: Score 1 • Not Met: Board/Committee review HRs strategy • Not Met: Examples/trends re HR discussion in the last reporting period Score 2 • Not Met: Meets both requirements under score 1 • Not Met: How affected stakeholders/HR experts informed discussions
A.2.3	Incentives and performance management	0	The individual elements of the assessment are met or not as follows: Score 1 • Not Met: Incentives for at least one board member • Not Met: At least one key HR risk, beyond employee H&S Score 2 • Not Met: Performance criteria made public • Not Met: Review of other board performance criteria
A.2.4	Business model strategy and risks	0	The individual elements of the assessment are met or not as follows: Score 1 • Not Met: Board process to review bussiness model and strategy • Not Met: Describe frequency and triggers for reviewing Score 2 • Not Met: Meets both requirements under score 1 • Not Met: Example of actions decided

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

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.1	Responsibility and resources for day-to-day human rights functions	0	The individual elements of the assessment are met or not as follows: Score 1 • Not Met: Score of 1 on A.1.2.a: See indicator A.1.2.a • Not Met: Senior responsibility for HR implementation and decision making Score 2 • Not Met: How it assigns Day-to-day responsibility • Not Met: Day-to-day resources and expertise allocation in own ops • Not Met: Resources and expertise allocation in the supply chain
B.1.2	Incentives and performance management	0	The individual elements of the assessment are met or not as follows: Score 1 • Not Met: Senior manager incentives for human rights • Not Met: At least one key HR risk, beyond employee H&S Score 2 • Not Met: Performance criteria made public • Not Met: Review of other senior management performance
B.1.3	Integration with enterprise risk management	0	The individual elements of the assessment are met or not as follows: Score 1 • Not Met: HR risks is integrated as part of enterprise risk system • Not Met: Provides an example Score 2 • Not Met: Audit Ctte or independent risk assessment
B.1.4.a	Communication /dissemination of policy commitment(s) to workers and external stakeholders	0	The individual elements of the assessment are met or not as follows: Score 1 • Not Met: Score of 1 on A.1.2.a: See indicator A.1.2.a • Not Met: Communicates its policy to all workers in own operations Score 2 • Not Met: Communication of policy commitments to stakeholder: The company states: "We will share our human rights policies and practices with our suppliers and pursue partnerships with others who share our commitment to respecting

Indicator Code	Indicator name	Score (out of 2)	Explanation
			human rights in the workplace. Our specific guidelines for Suppliers can be found in Brown-Forman's Supplier Guiding Principles with respect to Human Rights. We expect our suppliers to comply with our standards and that their subcontractors do the same'. However, it is not clear how it actually communicates policies to its external stakeholders (not suppliers). [Global Human Rights Statement, 08/2021: <a href="https://brown-forman.com">brown-forman.com</a> ] • Not Met: How policy commitments are made accessible to audience
B.1.4.b	Communication /dissemination of policy commitment(s) to business relationships	0	The individual elements of the assessment are met or not as follows: Score 1 • Not Met: Meets ILO requirement for suppliers on A.1.2.a • Not Met: Steps to communicate policy commitments to supply chain: The Company states that it shares its human rights policies and practices with its suppliers through its Supplier Guiding Principles on Human Rights. However, we could not identify evidence for the approach the company uses to communicate this policy and whether communications go down the supply chain. [Supplier Guiding Principles with respect to Human Rights, 17/03/2019: <a href="https://static.brown-forman.com">static.brown-forman.com</a> ] • Not Met: Requires suppliers to communicate policy requirements: The Company states that it asks its business partners to conduct their operations consistent with the principles of the United Nations Universal Declaration of Human Rights. However, it is not clear how they communicate it to their supplier, and whether it requires suppliers to communicate policies down the supply chain. [Supplier Guiding Principles with respect to Human Rights, 17/03/2019: <a href="https://static.brown-forman.com">static.brown-forman.com</a> ] Score 2 • Not Met: How HR commitments made binding/contractual • Not Met: Company requires suppliers to cascade down to their suppliers
B.1.5	Training on Human Rights	0	The individual elements of the assessment are met or not as follows: Score 1 • Not Met: Scores at least 1 on A.1.2.a • Not Met: How workers are trained on HR policy commitments: The Company states that it will communicate and educate employees. However no further details found. [Global Human Rights Statement, 08/2021: <a href="https://brown-forman.com">brown-forman.com</a> ] • Not Met: Trains relevant managers including procurement Score 2 • Not Met: Score of 2 on A.1.2.a • Not Met: Meets both requirements under score 1 • Not Met: Trains suppliers to meet company's HR commitment • Not Met: Disclose % trained
B.1.6	Monitoring and corrective actions	0	The individual elements of the assessment are met or not as follows: Score 1 • Not Met: Scores at least 1 on A.1.2.a: See indicator A.1.2.a • Not Met: Monitoring implementation of HR policy commitments across global ops and supply chain: The Company states that it will monitor and evaluate the level of compliance through self-assessments, on-site audits, employee surveys, and develop corrective action plans if deviations are found. To award this indicator, the Company needs to provide evidence of actual monitoring activities. [Global Human Rights Statement, 08/2021: <a href="https://brown-forman.com">brown-forman.com</a> ] • Not Met: Proportion of supply chain monitored • Not Met: Describe how workers are involved in monitoring Score 2 • Not Met: Score of 2 on A.1.2.a: See indicator A.1.2.a • Not Met: Describes corrective action process • Not Met: Disclose findings and number of corrective action
B.1.7	Engaging and terminating business relationships	0	The individual elements of the assessment are met or not as follows: Score 1 • Not Met: HR affects selection of suppliers • Not Met: HR affects on-going supplier relationships Score 2 • Not Met: Describe positive incentives offered to respect human rights • Not Met: Working with suppliers to meet HR requirements
B.1.8	Approach to engagement with affected stakeholders	0	The individual elements of the assessment are met or not as follows: Score 1 • Not Met: Stakeholder process or systems to identify and engage with workers/communities in the last two years • Not Met: Discloses stakeholders that HRs may be affected • Not Met: Provides two examples of engagement with stakeholders Score 2 • Not Met: Analysis of stakeholder views on company's HR issues

Indicator Code	Indicator name	Score (out of 2)	Explanation
			• Not Met: Describe how views influenced company's HR approach

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.1	Identifying human rights risks and impacts	0	The individual elements of the assessment are met or not as follows: Score 1 • Not Met: Identifying risks in own operations • Not Met: Identifying risks through relevant business relationships Score 2 • Not Met: Describe ongoing global risk identification in consultation with stakeholder/HR experts • Not Met: Triggered by new circumstances • Not Met: Describes risks identified
B.2.2	Assessing human rights risks and impacts	0	The individual elements of the assessment are met or not as follows: Score 1 • Not Met: Describe process for assessment of HR risks and discloses salient HR issues • Not Met: How process applies to supply chain • Not Met: Public disclosure of the results of HR assessment Score 2 • Not Met: Meets all requirements under score 1 • Not Met: How it involved affected stakeholders in the assessment
B.2.3	Integrating and acting on human rights risks and impact assessments	0	The individual elements of the assessment are met or not as follows: Score 1 • Not Met: Action Plans to mitigate risks • Not Met: Description of how global system applies to supply chain • Not Met: Example of actions decided on at least 1 salient HR issues: The Company discloses that 'reduced the amount of repetitive motion by our employees, which mitigates injuries'. However it is not clear what is the company's plan to mitigate the salient HR risks [Corporate Responsibility report, 2019: <a href="https://static.brown-forman.com">static.brown-forman.com</a> ] Score 2 • Not Met: Meets all requirements under score 1 • Not Met: Involve stakeholders in decisions about actions
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 • Not Met: System for tracking or monitor if actions taken are effective • Not Met: Lessons learnt from checking system effectiveness Score 2 • Not Met: Meets both requirements under score 1 • Not Met: Involve stakeholders in evaluation of actions taken
B.2.5	Communicating on human rights impacts	0	The individual elements of the assessment are met or not as follows: Score 1 • Not Met: Provides two examples of comms with stakeholders Score 2 • Not Met: Describe challenges to effective comms and how it is working to address them

## 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 • Met: Channel accessible to all workers: The Company operates anonymous compliance hotline and online reporting channel for employees. It also runs the International toll-free service number for international employees. [Global Human Rights Statement, 08/2021: <a href="https://brown-forman.com">brown-forman.com</a> ] Score 2 • Not Met: Channel is available in all appropriate languages and workers aware • Not Met: Describe how workers in the supply chain have access to grievance mechanism • Not Met: Expect Suppliers to convey expectation to their own suppliers
C.2	Grievance channel(s)/mechanism(s) to receive complaints or	0	The individual elements of the assessment are met or not as follows: Score 1 • Not Met: Grievance mechanism for community Score 2 • Not Met: Describes accessibility and local languages and stakeholder awareness

Indicator Code	Indicator name	Score (out of 2)	Explanation
	concerns from external individuals and communities		<ul style="list-style-type: none"> <li>• Not Met: Communities access mechanism direct or through suppliers: The company does not provide a grievance mechanism for community.</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</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</li> <li>• Met: Practical measures to prevent retaliation: The Company operates anonymous compliance hotline and online reporting. [Global Human Rights Statement, 08/2021: <a href="https://www.brown-forman.com">brown-forman.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Company indicate it will not retaliate against workers/stakeholders</li> <li>• Not Met: Expects suppliers to prohibit retaliation against workers/stakeholders</li> </ul>
C.6	Company involvement with state-based judicial and non-judicial grievance mechanisms	0	<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</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	<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</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>• Not Met: Changes to systems, processes and practices to stop similar impact</li> <li>• Not Met: Describe approach to monitoring implementation of agreed remedy</li> <li>• Not Met: Approach to learning from incident to prevent future impacts</li> </ul>
C.8	Communication on the effectiveness of grievance 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</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: The Supplier guiding principles require 'payment of fair wages in line with norms for the industry and the market'. No further requirement found including living wages, or a salary that covers for the employee, family and/or dependents, and provides form some discretionary income. [Supplier Guiding Principles with respect to Human Rights, 17/03/2019: <a href="http://static.brown-forman.com">static.brown-forman.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)</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> <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 states that supplier should not permit any form of exploitative child labour. In those situations where minors may be employed, it will act to assure that such employment is legal and will not lead to a child losing his or her educational opportunities. However we found no evidence of requirements for age verification and remediation programmes. [Supplier Guiding Principles with respect to Human Rights, 17/03/2019: <a href="http://static.brown-forman.com">static.brown-forman.com</a>]</li> <li>• Not Met: How working with suppliers on child labour</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <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</li> <li>• Not Met: How working with suppliers on debt &amp; fees</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Assessment of the number affected by payment of recruitment fees</li> <li>• Not Met: Analysis of trends in progress made</li> </ul>
D.1.5.d	Prohibition of forced labour: Wage practices (in the supply chain)	0	<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</li> <li>• Not Met: How working with suppliers on free movement</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Assessment of the number affected by retaining docs or restricting movement</li> <li>• Not Met: Provides analysis of trends demonstrating progress</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.1.6.b	Freedom of association and collective bargaining (in the supply chain)	0	<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 expects its suppliers to recognize the legal rights of employees to choose or not choose to form and join legally recognized trade (collective bargaining) unions. Employees who choose or not choose to form and/or join trade unions or other organizations shall not be discriminated against or harassed on account of lawful activities. However, in regards to collective bargaining it is not clear whether the Company is requiring to respecting this right in all contexts, as it indicates 'form and join legally recognized trade (collective bargaining) unions'. 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. [Supplier Guiding Principles with respect to Human Rights, 17/03/2019: <a href="https://static.brown-forman.com">static.brown-forman.com</a>]</li> <li>• Not Met: How working with suppliers on FoA and CB</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Assessment of the number affected by restrictions to FoA and CB in the SP</li> <li>• Not Met: Provides analysis of trends demonstrating progress</li> </ul>
D.1.7.b	Health and safety: Fatalities, lost days, injury, occupational disease rates (in the supply chain)	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Sets out clear Health and Safety requirements: The Company expects its suppliers to comply with all laws related to workplace safety. Where national / local laws do not exist then responsible international standards are to be applied. [Supplier Guiding Principles with respect to Human Rights, 17/03/2019: <a href="https://static.brown-forman.com">static.brown-forman.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: Figures found relate to Company employees. [FY 2021 Integrated Annual Report, 2021: <a href="https://brown-forman.com">brown-forman.com</a>]</li> </ul> <p>Score 2</p> <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	<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: Rules on land &amp; owners in codes or contracts</li> <li>• Not Met: How working with suppliers on land issues</li> </ul> <p>Score 2</p> <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	<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: Rules on water stewardship in codes or contracts</li> <li>• Not Met: How working with suppliers on water stewardship issues</li> </ul> <p>Score 2</p> <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	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Women's rights in codes or contracts</li> <li>• Not Met: How working with suppliers on women's rights</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Assessment on the number affected by discrimination or unsafe working conditions</li> <li>• Not Met: Provides analysis of trends demonstrating progress</li> </ul>



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

Indicator Code	Indicator name	Score (out of 2)	Explanation
E(1).0	Serious allegation No 1		No allegations meeting the CHRB severity threshold were found, and so the score of 2.91 out of 80 points scored in themes A-D has been applied to produce a score of 0.73 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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