Company Name: Carrefour
Industry: Agricultural Products (Supply Chain only)
Overall Score: 12.1 out of 100

<table>
<thead>
<tr>
<th>Theme Score</th>
<th>Out of</th>
<th>For Theme</th>
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<tbody>
<tr>
<td>0.3</td>
<td>10</td>
<td>A. Governance and Policies</td>
</tr>
<tr>
<td>7.9</td>
<td>25</td>
<td>B. Embedding Respect and Human Rights Due Diligence</td>
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<tr>
<td>1.5</td>
<td>20</td>
<td>C. Remedies and Grievance Mechanisms</td>
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<tr>
<td>0.0</td>
<td>25</td>
<td>D. Performance: Company Human Rights Practices</td>
</tr>
<tr>
<td>2.4</td>
<td>20</td>
<td>E. Performance: Responses to Serious Allegations</td>
</tr>
</tbody>
</table>

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)

<table>
<thead>
<tr>
<th>Indicator Code</th>
<th>Indicator name</th>
<th>Score (out of 2)</th>
<th>Explanation</th>
</tr>
</thead>
</table>
| A.1.1          | Commitment to respect human rights | 0 | The individual elements of the assessment are met or not as follows:
  * Not Met: General HRs commitment: According to its Code of professional conduct: ‘Carrefour’s ethical commitment, which is detailed in our Policies, is consistent with its compliance with and promotion of: the Universal Declaration of Human Rights; the ILO’s eight fundamental conventions; the OECD guidelines for multinational enterprises; the 10 principles that make up the United Nations Global Compact’. However, ‘to be consistent with’ is not considered a formal statement of commitment according to CHRB wording criteria. In addition, the Company references its Policies, but those were not found in the public domain. [Code of professional conduct, 07/2017: secure.ethicspoint.eu] & [Ethical Principles, 10/2015: carrefour.com]
  * Not Met: International Bill of Human Rights
    Score 2
  * Not Met: Commitment to the UNGPs |
<table>
<thead>
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<th>Explanation</th>
</tr>
</thead>
<tbody>
<tr>
<td>A.1.2.a</td>
<td>Commitment to respect the human rights of workers: ILO Declaration on Fundamental Principles and Rights at Work</td>
<td>0</td>
<td>- Not Met: Commitment to the OECD Guidelines for Multinational Enterprises: According to its Code of professional conduct: 'Carrefour’s ethical commitment, which is detailed in our Policies, is consistent with its compliance with and promotion of: the Universal Declaration of Human Rights; the ILO’s eight fundamental conventions; the OECD guidelines for multinational enterprises; the 10 principles that make up the United Nations Global Compact'. However, 'to be consistent with' is not considered a formal statement of commitment according to CHRB wording criteria. In addition, the Company references its Policies, but those were not found in the public domain. [Code of professional conduct, 07/2017: secure.ethicspoint.eu] &amp; [Carrefour code of business conduct: www2.filcams.cgil.it]</td>
</tr>
<tr>
<td>A.1.2.b</td>
<td>Commitment to respect the human rights of workers: Health and safety and working hours</td>
<td>0</td>
<td>- Not Met: Commitment to respect H&amp;S of workers</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>- Not Met: Respect ILO labour standards on working hours or Commits to 48 hours regular work week</td>
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<td></td>
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<td></td>
<td>- Not Met: Expect suppliers to commit to H&amp;S of their workers: The Company’s CSR Commitment Charter for Controlled product suppliers includes all ILO core labour standards. With respect freedom of association and collective bargaining: the Company indicates: ‘Workers have the right to join or form trade unions of their own choosing and to bargain collectively, without prior authorization from suppliers’ management. Suppliers shall not interfere with, obstruct or prevent such legitimate activities. 3.2 Where the right to freedom of association and collective bargaining is restricted or prohibited under law, suppliers shall not hinder alternative forms of independent and free workers representation and negotiation, in accordance with international labour standards. ‘The Company also ’requires its suppliers to share these same principles with their own suppliers, service providers and subcontractors though an information and awareness-raising process.’ However, it is not clear whether this Charter applies to all supplier or only for a part of them (controlled product suppliers). No other policy documents related to suppliers were found. [CSR Commitment Charter – Controlled product suppliers, 2018: carrefour.com]</td>
</tr>
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<td></td>
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<td>- Not Met: Expect suppliers to share these same principles with their own suppliers, service providers and subcontractors through an information and awareness-raising process.</td>
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<td></td>
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<td>- Not Met: Expect suppliers to share these same principles with their own suppliers, service providers and subcontractors through an information and awareness-raising process.</td>
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<td>- Not Met: Expect suppliers to share these same principles with their own suppliers, service providers and subcontractors through an information and awareness-raising process.</td>
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<tr>
<td>Indicator Code</td>
<td>Indicator name</td>
<td>Score (out of 2)</td>
<td>Explanation</td>
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</tbody>
</table>
| A.1.3.a.AG    | Commitment to respect human rights particularly relevant to the industry – land, natural resources and indigenous peoples’ rights (AG) | 0               | The individual elements of the assessment are met or not as follows: Score 1  
• Not Met: Respect land ownership and natural resources as set out in VGGT  
• Not Met: Respect land ownership and natural resources as set out in The IFC Performance Standards  
• Not Met: Respecting indigenous peoples’ rights or ILO Convention No.169 or UN Declaration  
• Not Met: Expecting suppliers to make these commitments Score 2  
• Not Met: Respecting the right to water  
• Not Met: Company’s policy commits to obtain FPIC  
• Not Met: Expecting suppliers to make these commitments |
| A.1.3.b.AG    | Commitment to respect human rights particularly relevant to the industry – vulnerable groups (AG) | 0               | The individual elements of the assessment are met or not as follows: Score 1  
• Not Met: Women’s rights: The Company reports in its Universal Registration Document 2020 that the Company signed ‘in 2013 of WEPS (Women’s Empowerment Principles) in certain countries’. However, the WEPS’ signature is focused in certain countries only. [Universal registration document 2020, 2021: carrefour.com]  
• Not Met: Children’s rights  
• Not Met: Migrant worker’s rights  
• Not Met: Expects suppliers to respect at least one of these rights Score 2  
• Not Met: CEDAW/Women’s Empowerment Principles: The Company reports in its Universal Registration Document 2020 that the Company signed ‘in 2013 of WEPS (Women’s Empowerment Principles) in certain countries’. However, the WEPS’ signature is focused in certain countries only.  
• Not Met: Child Rights Convention/Business Principles  
• Not Met: Convention on migrant workers  
• Not Met: Expecting suppliers to respect these rights |
| A.1.4         | Commitment to remedy                                | 0               | The individual elements of the assessment are met or not as follows: Score 1  
• Not Met: The Company commits to remedy  
• Not Met: Company expect suppliers to make this commitment Score 2  
• Not Met: Collaborating with other remedy initiatives  
• Not Met: Work with suppliers to remedy impact |
| A.1.5         | Commitment to respect the rights of human rights defenders | 0               | The individual elements of the assessment are met or not as follows: Score 1  
• Not Met: Zero tolerance attacks on HRs Defenders (HRDs)  
• Not Met: Company expect suppliers to make this commitment Score 2  
• Not Met: Work with HRD to create safe and enabling environment |

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

<table>
<thead>
<tr>
<th>Indicator Code</th>
<th>Indicator name</th>
<th>Score (out of 2)</th>
<th>Explanation</th>
</tr>
</thead>
</table>
| A.2.1          | Commitment from the top   | 0.5             | The individual elements of the assessment are met or not as follows: Score 1  
• Met: Board level responsibility for HRs: The Company states that governance of the food transition and CSR policies is exercised jointly by the Group Executive Committee, the Board of Directors and the CSR Committee. The Company’s Board of Directors’ CSR Committee ‘reviews the Group’s CSR strategy and the roll-out of the related CSR initiatives’. The CSR Commitment Charter includes human rights. [CSR Method, N/A: carrefour.com] & [2019 Registration Document, 2020: carrefour.com]  
• 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 out of 2)

<table>
<thead>
<tr>
<th>Score (out of 2)</th>
<th>Explanation</th>
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</table>
| 0                | The individual elements of the assessment are met or not as follows: Score 1  
|                  | • Not Met: Board/Committee review HRs strategy: The Company states that the Board of Directors approves the strategy drawn up by the Executive Committee and evaluates its implementation. It discloses discussion that took place. However, it is not clear human rights strategy is also discussed [CSR Method, N/A: carrefour.com] |
|                  | • 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 out of 2)

<table>
<thead>
<tr>
<th>Score (out of 2)</th>
<th>Explanation</th>
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</table>
| 0                | The individual elements of the assessment are met or not as follows: Score 1  
|                  | • Not Met: Incentives for at least one board member: The Company states that it deployed a CSR and Food Transition index in order to monitor the achievement of its objectives. In 2019, the Group’s performance in meeting these objectives was included in the criteria for executive compensation and serves as the basis for calculating 25% of executive compensation as part of the long-term incentive plan, and 20% of the Chief Executive Officer’s compensation. The index measures CSR performance every year for the 17 indicators. In 2020, Carrefour exceeded its non-financial objectives, as measured by its CSR & Food Transition Index with a score of 115%. This performance reflects the progress made in cutting greenhouse gas emissions, reducing food waste, developing agroecology and deploying its packaging strategy. In its latest report, the indicators include women in key positions, percentage of disabled employees, training hours, implementation of action plan on health/safety/quality of life in the workplace. However, it seems human rights issues are not included. Previous assessment was based on a source dated in 2018, which is now out of the tree-year timeframe that the methodology requires. [Universal registration document 2020, 2021: carrefour.com]  
|                  | • Not Met: At least one key HR risk, beyond employee H&S: The Company states that Carrefour’s 2020 CSR & Food Transition Index includes % of women appointed to key positions within the group, implement action plans on health, safety and quality of life in the workplace. No further details found [Universal registration document 2020, 2021: carrefour.com] |
|                  | 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 out of 2)

<table>
<thead>
<tr>
<th>Score (out of 2)</th>
<th>Explanation</th>
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</table>
| 0                | The individual elements of the assessment are met or not as follows: Score 1  
|                  | • Not Met: Board process to review business 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)

<table>
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<tr>
<th>Indicator Code</th>
<th>Indicator name</th>
<th>Score (out of 2)</th>
<th>Explanation</th>
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</table>
| 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: In its Registration Document, the Company indicates 'The Group’s Executive Management has created the following organisation structure: [...] Group CSR Department: implementing a duty of care plan aimed at assessing and mitigating risks associated with the environment, human rights, and health and safety'. However, it is not clear where specifically within the Executive management, which committee or person has the responsibility allocated. [Universal registration document 2020, 2021: carrefour.com] |
|                |                |                  | Score 2  
|                |                |                  | • Not Met: How it assigns Day-to-day responsibility: See above. No further details found beyond the existence of CSR Department.  
|                |                |                  | • Not Met: Day-to-day resources and expertise allocation in own ops  
<p>|                |                |                  | • Not Met: Resources and expertise allocation in the supply chain |</p>
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<tr>
<th>Indicator Code</th>
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<th>Score (out of 2)</th>
<th>Explanation</th>
</tr>
</thead>
<tbody>
<tr>
<td>B.1.2</td>
<td>Incentives and performance management</td>
<td>0</td>
<td>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&amp;S  Score 2 • Not Met: Performance criteria made public • Not Met: Review of other senior management performance</td>
</tr>
<tr>
<td>B.1.3</td>
<td>Integration with enterprise risk management</td>
<td>0</td>
<td>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: The Company states that the Group Risk department is responsible for overseeing the risk management system. This system relies on identifying, assessing, analysing and addressing risks likely to affect people, assets, the environment and the Group’s objectives. In 2020, there are 14 key risks addressed, including ensuring the sustainability of the supply chain. However, it is not clear whether human rights issues in supply chain are included. [Universal registration document 2020, 2021: carrefour.com] • Not Met: Provides an example  Score 2 • Not Met: Audit Ctte or independent risk assessment</td>
</tr>
<tr>
<td>B.1.4.a</td>
<td>Communication /dissemination of policy commitment(s) to workers and external stakeholders</td>
<td>0</td>
<td>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: The Company states that its ethical principles help each employee to ask himself the right attitude to adopt, especially when faced with delicate situations that he may have to deal with. The Ethical Principles are distributed to all Carrefour employees and signed by all new arrivals. The ethical principles are as follows: respecting diversity, contributing to a safe and healthy working environment, favouring social dialogue, refusing all harassment and discrimination, selecting and treating suppliers objectively and fairly, developing transparent business relations, respecting commitments to partners, refraining from any agreement or unfair practice, ensuring the safety of people and property, protecting the company’s resources and assets, guaranteeing confidentiality, preserving the environment, being honest, individually and collectively, providing reliable and faithful reporting, avoiding conflicts of interest and refusing all forms of corruption. It also draws on the main commitments made in the Universal Declaration of Human Rights and International Labour Organisation conventions. However, it is unclear if this information is communicated in local languages. [Ethics and Responsible Business Conduct, N/A: carrefour.com] &amp; [Universal registration document 2020, 2021: carrefour.com]  Score 2 • Not Met: Communication of policy commitments to stakeholder • Not Met: How policy commitments are made accessible to audience</td>
</tr>
<tr>
<td>B.1.4.b</td>
<td>Communication /dissemination of policy commitment(s) to business relationships</td>
<td>0.5</td>
<td>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: See indicator A.1.2.a • Met: Requires suppliers to communicate policy requirements: The Company states that all suppliers commit to comply with the principles listed in the Commitment Charter for Controlled Product Supplier, which includes human rights requirements. Suppliers also commits to ensuring that their own suppliers and subcontractors comply with these same principles. The Company also requires its suppliers to share these same principles with their own suppliers, service providers and subcontractors through an information and awareness-raising process. [Managing suppliers, 06/2021: carrefour.com]  Score 2 • Met: How HR commitments made binding/contractual: The Company states that the commitment of suppliers of Carrefour-brand products to human rights is reflected first and foremost through their signature of a Supplier Commitment Charter, which is an integral part of all purchasing contracts in all Group host countries. [Universal registration document 2020, 2021: carrefour.com] • Not Met: Company requires suppliers to cascade down to their suppliers: As stated above, the supplier charter indicates that Carrefour also expects its suppliers to take measures to inform and raise awareness, and implement reference frameworks on ethics and integrity, in relation to their own suppliers, providers, and subcontractors. However, it is not clear if the Company’s human rights commitments form part of contracts down the supply chain. [Managing suppliers, 06/2021: carrefour.com]</td>
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<tr>
<td>Indicator Code</td>
<td>Indicator name</td>
<td>Score (out of 2)</td>
<td>Explanation</td>
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</table>
| 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: See indicator A.1.2.a  
- Not Met: How workers are trained on HR policy commitments  
- Not Met: Trains relevant managers including procurement: The Company states that its Sourcing teams roll out specific training programmes every year. The Group has also drawn up the Good Factory Standard, a practical training document featuring a breakdown by sector and/or by type of product (bazaar, clothing, wood, leather, etc.). However, no further details found on the training. [Managing suppliers, 06/2021: [carrefour.com](https://carrefour.com)]  
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: The Company states that to support its suppliers and promote CSR across its supply chains, Carrefour implements training programmes and regional projects. Carrefour trains its suppliers in partnership with consultants or local NGOs. However, no further description found of how the training is carried out. [Managing suppliers, 06/2021: [carrefour.com](https://carrefour.com)]  
- Not Met: Disclose % trained |
| B.1.6 | Monitoring and corrective actions | 0.5 | 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: Monitoring implementation of HR policy commitments across global ops and supply chain: The Company states that Carrefour is committed to improving working conditions and protecting human rights among its suppliers, and has implemented tools and procedures to verify its suppliers’ compliance and assist them in the compliance process. In accordance with its purchasing rules, all of its supply plants located in high-risk or risky countries must undergo a compliance audit. The audit are conducted under Initiative for Compliance and Sustainability (ICS) and Business Social Compliance Programme (BSCI) standards. For suppliers located in low-risk countries, the inspection system is adapted to the business, local problems and on-site practices, as external audits are not performed systematically. However, the compliance audit is for its suppliers and does not include its own operations. Previous assessment was partially based in a source dated in 2018, out of the three year timeframe that the methodology requires.  
- Not Met: Describes corrective action process: The Company indicates that independent audits and inspections of supplier premises give rise to action plans designed to remedy any violations observed. ‘In the event of a violation of human rights or environmental damage, corrective programmes are implemented in conjunction with the stakeholders and local communities concerned, according to the situation facing them. The main occurrences of non-compliance identified in the Carrefour supplier network related to working hours, compensation levels and workers’ health and safety […] The supplier is required to implement each corrective action in the plan before a specified deadline. Compliance with the action plan and implementation deadlines is monitored through follow-up audits’. In 2020, the Company conducted the social audit for 1,109 companies and 17% of audits conducted on potential production plants generated one or more alerts. [Universal registration document 2020, 2021: [carrefour.com](https://carrefour.com)]  
- Met: Disclose findings and number of corrective action: As indicated above, the Company conducted the social audit for 1,109 companies and 17% of audits conducted on potential production plants generated one or more alerts. The main occurrences were related to working hours, compensation and health and safety. [Universal registration document 2020, 2021: [carrefour.com](https://carrefour.com)]  
- Met: Score of 2 on A.1.2.a  
- Not Met: Proportion of supply chain monitored  
- Not Met: How workers are trained on HR policy commitments |
| B.1.7 | Engaging and terminating business relationships | 2 | The individual elements of the assessment are met or not as follows:  
Score 1  
- Met: HR affects selection of suppliers: The Company indicates that ‘a number of checks are carried out before a supplier is listed: mandatory pre-audit carried out by Carrefour’s Sourcing teams […] If the pre-audit is not good […] then there is no listing […]’. [Managing suppliers, 06/2021: [carrefour.com](https://carrefour.com)]  
- Met: HR affects on-going supplier relationships: The Company states that failure by the Supplier to comply with any of its obligations under the present Charter shall result in the immediate termination of commercial relations with the production site where the breach was noticed or the immediate and automatic termination of |
<table>
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</thead>
<tbody>
<tr>
<td>indicator code</td>
<td>indicator name</td>
<td></td>
<td>The General Terms of Supply by Carrefour and shall, as applicable, be the subject of damages and interests which may be claimed from the Supplier. [Managing suppliers, 06/2021: carrefour.com] Score 2</td>
</tr>
</tbody>
</table>
|                |                                        |                 | • Not Met: Describe positive incentives offered to respect human rights  
• Met: Working with suppliers to meet HR requirements: The Company states that after supplier social compliance audit, training or specific support may be provided by Carrefour’s teams to suppliers where warranted by non-compliance issues. It also states that Carrefour trains its suppliers in partnership with consultants or local NGOs. Carrefour’s Global Sourcing teams roll out specific training programmes every year. In 2019, Carrefour stepped up its work with tier 1 suppliers in Bangladesh, Pakistan and India to provide plants with training and other tools to deal with identified risks. [Universal registration document 2020, 2021: carrefour.com] |
| 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: The Company reports that regarding risk of human rights violations, special dialogue on the impact of modern slavery in the supply chains, child labour, decent wages and the system of benefits in textile production plants were carried out. About 20 dedicated meetings were held during the year, and collaboration entered into with the International Federation for Human Rights (FIDH) to review the action plans in progress. The Company also had consultation with experts on living wages. However, there is no description on how it identified or engaged with affected stakeholders. [Universal registration document 2020, 2021: carrefour.com]  
• Not Met: Discloses stakeholders that HRs may be affected  
• Not Met: Provides two examples of engagement with stakeholders: As indicated above, the Company discloses dialogue with stakeholders on risks identified in 2020. Although many of them include human rights and dialogue with NGOs and other multistakeholder initiatives, the only example of affected stakeholder engagement refers to dialogue with trade unions in the context of health and safety. Entities engaged as part of human-rights related risks include International Federation for Human Rights, Global Living Wage coalition, Ethical Trading Initiative, Fair Wage Network, Consumer Goods Forum, WWF, etc. However, no further examples found of engagement with affected stakeholders, their representatives, or stakeholder initiatives directly representing them in a specific context.  
Score 2  
• Not Met: Analysis of stakeholder views on company’s HR issues  
• 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 | 1.5             | The individual elements of the assessment are met or not as follows:  
Score 1  
• Met: Identifying risks in own operations: As part of implementation of the duty care plan following French Law, the Company explains the process it is following to identify and assess its risks including human rights risks. It has three steps: The first consists in identifying as possible all the risks to which Carrefour exposes the environment and its stakeholders. This step involves consulting ‘internal and external stakeholders in the process of identifying and reviewing the key risks according to their areas of expertise.’ Stakeholders include relevant operational staff and partner NGOs and trade Unions. It uses compliance risk databases to identify compliance issues. Following this, the Company has identified risks related to business process, business sector and geography. [2019 Registration Document, 2020: carrefour.com]  
• Met: Identifying risks through relevant business relationships: The Company indicates that ‘a Risk and Sourcing Committee was set up in 2019. It analyses the risks related to Carrefour’s sourcing practices and devises strategies for dealing with them. It draws up and circulates the Group’s purchasing rules’. [Universal registration document 2020, 2021: carrefour.com] |
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</table>
| B.2.2 | Assessing human rights risks and impacts | 1 | The individual elements of the assessment are met or not as follows:  
Score 1  
• Met: Describe process for assessment of HR risks and discloses salient HR issues: The risk mapping process started with the identification of all the risks to which Carrefour is exposed with help of stakeholders. The second consists in assessing those risks with regard to the probability of occurrence and the severity of potential impacts. The risk is then rated based on a combination of its importance and frequency. It has identified risks related to business activities, to business sectors (particularly as part of supplier and service provider relationships), and risks related to countries in which it operates or sources certain products. The combination of risk type is supplemented by cross-referencing with other information sources, including updated lists of human rights violations by companies operating in the same or comparable sectors, and consultations with NGOs involved in human rights issues. [2019 Registration Document, 2020: carrefour.com]  
• Met: How process applies to supply chain: The process described above includes supply chain. [2019 Registration Document, 2020: carrefour.com]  
• Met: Public disclosure of the results of HR assessment: The Company discloses the following priority risks factors relating to supply chain management: workers’ health and safety violations and pollution at textile factories; human rights violations at factories located in high-risk countries; inadequate worker compensation by our suppliers; deforestation for conversion of land for agriculture […] human rights and environmental violations related to natural textile materials”. [Universal registration document 2020, 2021: carrefour.com]  
Score 2  
• 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: The Company states that it has post-audit corrective action plans for its suppliers. In the event of a violation of human rights or environmental damage, corrective programmes are implemented in conjunction with the stakeholders and local communities concerned, according to the situation facing them. The main occurrences of non-compliance identified in the Carrefour supplier network related to working hours, compensation levels and workers’ health and safety. The Supplier is required to implement each corrective action in the plan before a specified deadline. Compliance with the action plan and implementation deadlines is monitored through follow-up audits. If a supplier audit report contains an critical non-compliance issue, Carrefour will be informed within 48 hours. These issues mainly concern child labour, forced labour, disciplinary measures, attempted corruption, document falsification and safety conditions threatening the lives of workers. Immediate action is then taken by Carrefour and/or the supplier. Training or specific support may be provided by Carrefour’s teams to suppliers. However, there is no description of the procedures of corrective action. [Universal registration document 2020, 2021: carrefour.com]  
• Not Met: Description of how global system applies to supply chain  
• Not Met: Example of actions decided on at least 1 salient HR issues  
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 | 1 | The individual elements of the assessment are met or not as follows:  
Score 1  
• Met: System for tracking or monitor if actions taken are effective: The Company discloses the framework and prevention measures for the Company’s policies and codes in the 2019 Duty of Care Plan Effectiveness Report. The system is reviewed annually and gives detail of the identification and description of risks and risk  |
<table>
<thead>
<tr>
<th>Indicator Code</th>
<th>Indicator name</th>
<th>Score (out of 2)</th>
<th>Explanation</th>
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</thead>
<tbody>
<tr>
<td>risks and impacts</td>
<td></td>
<td></td>
<td>situations, combining several approaches. [2019 Registration Document, 2020: carrefour.com]</td>
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<tr>
<td></td>
<td></td>
<td></td>
<td>• Not Met: Lessons learnt from checking system effectiveness</td>
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<td></td>
<td></td>
<td></td>
<td>• Not Met: Meets both requirements under score 1</td>
</tr>
<tr>
<td>B.2.5</td>
<td>Communicating on human rights impacts</td>
<td>0</td>
<td>The individual elements of the assessment are met or not as follows:</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>• Not Met: Provides two examples of comm with stakeholders: The Company describes cases of 'manifestation of risk or alerts identified in 2020' and measures taken and development of existing action plans. However, no details found of the communication processes held with affected stakeholders in these cases. [Universal registration document 2020, 2021: carrefour.com]</td>
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<tr>
<td></td>
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<td></td>
<td>• Not Met: Describe challenges to effective comm and how it is working to address them</td>
</tr>
<tr>
<td>C. Remedies and Grievance Mechanisms (20% of Total)</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>C.1</td>
<td>Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers</td>
<td>1.5</td>
<td>The individual elements of the assessment are met or not as follows:</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>• Met: Channel accessible to all workers: The Company has an ethics whistleblowing system that can be used by Group employees or stakeholders to report any situation or behaviour that does not comply with the Group’s Ethics Principles. The system covers all the subject matters addressed in the Ethics Principles, and in particular human rights and fundamental freedoms, health and safety, and the environment. The Company also has the ethics alert line available 24 hours a day, 7 days a week. It is also a means for employees wishing to report situations or types of behaviour that violate its ethical principles. [Universal registration document 2020, 2021: carrefour.com]</td>
</tr>
<tr>
<td></td>
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<td></td>
<td>• Not Met: Channel is available in all appropriate languages and workers aware: The ethics website provides various language options for reporters who wants to report a concern online. The ethics alert line also provides service in all of the Group’s languages. It is not clear, however, how workers are trained/made aware of the mechanism. [Universal registration document 2020, 2021: carrefour.com]</td>
</tr>
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<td></td>
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<td></td>
<td>• Met: Describe how workers in the supply chain have access to grievance mechanism: As indicated in the FAQ’s section of the alert line website, the Company’s ethics line is open for suppliers and service providers to raise concerns. [Ethics alert line, N/A: ethique.carrefour.com]</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>• Not Met: Expect Suppliers to convey expectation to their own suppliers</td>
</tr>
<tr>
<td>C.2</td>
<td>Grievance channel(s)/mechanism(s) to receive complaints or concerns from external individuals and communities</td>
<td>0</td>
<td>The individual elements of the assessment are met or not as follows:</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>• Not Met: Grievance mechanism for community: The EthicsPoint website and phone numbers are publicly available, however, it states specifically that it &quot;enables Carrefour employees, suppliers or service providers to report any situation or behaviour which is contrary to Our Principles of Ethics in a confidential manner.&quot; No mention of external stakeholders found. [Ethics alert line, N/A: ethique.carrefour.com]</td>
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<tr>
<td></td>
<td></td>
<td></td>
<td>• Not Met: Describes accessibility and local languages and stakeholder awareness: The ethics line is available on its website in 11 different languages. However, as mentioned above, no evidence found of this line being open to other external stakeholders including communities. [Ethics alert line, N/A: ethique.carrefour.com]</td>
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<tr>
<td></td>
<td></td>
<td></td>
<td>• Not Met: Communities access mechanism direct or through suppliers</td>
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<td></td>
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<td></td>
<td>• Not Met: Expect supplier to convey expectation to their own suppliers</td>
</tr>
<tr>
<td>C.3</td>
<td>Users are involved in the design and performance of the channel(s)/mechanism(s)</td>
<td>0</td>
<td>The individual elements of the assessment are met or not as follows:</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>• Not Met: Engages users to create or assess system</td>
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<td></td>
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<td></td>
<td>• Not Met: Examples (at least two) of how they do this</td>
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<td>• Not Met: Engages with potential or actual users on the improvement of the mechanism</td>
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<td>• Not Met: Provides user engagement example (at least two) on improvement</td>
</tr>
<tr>
<td>C.4</td>
<td>Procedures related to the mechanism(s)</td>
<td>0</td>
<td>The individual elements of the assessment are met or not as follows:</td>
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<tr>
<td></td>
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<td>• Not Met: Response timescales and how complainants will be informed</td>
</tr>
<tr>
<td>Indicator Code</td>
<td>Indicator name</td>
<td>Score (out of 2)</td>
<td>Explanation</td>
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</table>
| channel(s) are equitable, publicly available and explained | | | • Not Met: Describe support (technical, financial, etc) available for equal access by complainants  
Score 2  
• Not Met: Describe types of outcome to complainant through use of mechanism  
• Not Met: Escalation to senior/independent level |
| C.5 | Prohibition of retaliation for raising complaints or concerns | 0 |  
The individual elements of the assessment are met or not as follows:  
Score 1  
• Not Met: Public statement prohibiting retaliation: The Company indicates in its Code of Professional Conduct, which goes together with the procedure to issue an alert that 'no sanctions may be taken against employees who report - in good faith - any failures to comply with these principles'. However, it is not clear if retaliation against other stakeholders is prohibited. [Code of professional conduct, 07/2017: secure.ethicspoint.eu]  
• Not Met: Practical measures to prevent retaliation: Although the Company guarantees confidentiality, no evidence found of measures to prevent sanctions/retaliation. [Code of professional conduct, 07/2017: secure.ethicspoint.eu]  
Score 2  
• Not Met: Company indicate it will not retaliate against workers/stakeholders  
• Not Met: Expects suppliers to prohibit retaliation against workers/stakeholders |
| C.6 | Company involvement with state-based judicial and non-judicial grievance mechanisms | 0 | The individual elements of the assessment are met or not as follows:  
Score 1  
• Not Met: Complainants not asked to waive rights  
• Not Met: Company does not require confidentiality provisions  
Score 2  
• Not Met: Will work with state based non judicial mechanisms  
• Not Met: Example of issue resolved (if applicable) |
| C.7 | Remediying adverse impacts | 0 | The individual elements of the assessment are met or not as follows:  
Score 1  
• Not Met: Describes how remedy has been provided  
• Not Met: Says how it would provide remedy for victims if no adverse impact identified  
Score 2  
• Not Met: Changes to systems, processes and practices to stop similar impact  
• Not Met: Describe approach to monitoring implementation of agreed remedy  
• Not Met: Approach to learning from incident to prevent future impacts |
| C.8 | Communication on the effectiveness of grievance mechanism(s) and incorporating lessons learned | 0 | The individual elements of the assessment are met or not as follows:  
Score 1  
• Not Met: Number grievances filed, addressed or resolved and outcome achieved: Although the Company describes manifestations of risks or alerts identified in relation to human rights risk, no details found on the total number of grievances filed, addressed or resolved and the outcomes for workers and other complainants. [Universal registration document 2020, 2021: carrefour.com]  
• Not Met: How lessons from mechanism improve management system  
 Score 2  
• Not Met: Evaluation of the channel/mechanism and changes made as result  
• Not Met: Describes procedures to address delays of outcomes agreed with stakeholders |
<table>
<thead>
<tr>
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<tbody>
<tr>
<td>D.1.1.b</td>
<td>Living wage (in the supply chain)</td>
<td>0</td>
<td>The individual elements of the assessment are met or not as follows: Score 1  • Not Met: Discloses timebound target for suppliers to pay living wage or include in code or contracts: The Company states in its CSR Commitment Charter -Controlled product suppliers that suppliers must compensate their workers by providing wages, overtime pay, benefits and paid leave which respectively meet or exceed legal minimum and/ or industry benchmark standards and/ or collective agreements, whichever is higher. Wages and compensation for regular working hours shall meet basic needs and provide some discretionary income for workers and their families. It is not clear, however, whether all agricultural-related suppliers are covered, the scope of 'controlled products' include the following: are products purchased by Carrefour, whether for resale or not, which meet a set of specifications defined by Carrefour and which are subject to a specific quality control process by Carrefour'. [CSR Commitment Charter – Controlled product suppliers, 2018: carrefour.com]  • Not Met: Improving living wage practices of suppliers Score 2  • Not Met: Assessment of number affected by payment below living wage  • Not Met: Provides analysis of trends demonstrating progress</td>
</tr>
<tr>
<td>D.1.2</td>
<td>Aligning purchasing decisions with human rights</td>
<td>0</td>
<td>The individual elements of the assessment are met or not as follows: Score 1  • Not Met: Avoids business model pressure on HRs (purchasing practices): In its supplier code, the company states 'Conscious that the respect of these commitments can only be fully realized through a collaborative relationship with its suppliers, Carrefour commits not to impose conditions on its suppliers that would prevent them from implementing these commitments'. However, no further details found. [CSR Commitment Charter – Controlled product suppliers, 2018: carrefour.com]  • Not Met: Practices adopted to pay suppliers in line with agreed timeframes  • Not Met: Review own operations to mitigate negative impact Score 2  • Not Met: Meets all requirements under score 1  • Not Met: Examples of how it assessed, addressed and change purchasing practices</td>
</tr>
<tr>
<td>D.1.3</td>
<td>Mapping and disclosing the supply chain</td>
<td>0</td>
<td>The individual elements of the assessment are met or not as follows: Score 1  • Not Met: Identifies direct and indirect suppliers back to manufacturing sites (factories or fields): The Company has published list of textile factories including the name, address and country of origin of its textile products suppliers. However, it is not clear whether the Company has a list for all its suppliers, including direct and indirect suppliers. [Managing suppliers, 06/2021: carrefour.com] Score 2  • Not Met: Discloses names and locations of significant parts of SP and why: As above. No evidence found in relation to agricultural suppliers.  • Not Met: Discloses which direct or indirect suppliers is involved in higher-risk activities</td>
</tr>
<tr>
<td>D.1.4.b</td>
<td>Prohibition of child labour: Age verification and corrective actions (in the supply chain)</td>
<td>0</td>
<td>The individual elements of the assessment are met or not as follows: Score 1  • Not Met: Child Labour rules in codes or contracts: The company does Prohibits 'child Labour: not to employ children under the age 15'. No evidence found of guidelines on age verification or remediation programmes in its agreements or supplier code. [CSR Commitment Charter – Controlled product suppliers, 2018: carrefour.com]  • Not Met: How working with suppliers on child labour Score 2  • Not Met: Assessment of number affected by child labour in supply chain  • Not Met: Analysis of trends in progress made</td>
</tr>
<tr>
<td>Indicator Code</td>
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<td>Explanation</td>
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<tr>
<td>D.1.5.b</td>
<td>Prohibition of forced labour: Recruitment fees and costs (in the supply chain)</td>
<td>0</td>
<td>The individual elements of the assessment are met or not as follows: Score 1  • Not Met: Debt and fees rules in codes or contracts: The Company states that bonded labour is prohibited. Suppliers shall not use any form of bonded labour nor permit or encourage workers to incur debt through recruitment fees, fines, or other means. The requirement also affects subcontractors (assumed to include third party recruiters). It is not clear, however, whether all agricultural-related suppliers are covered, the scope of 'controlled products' include the following: are products purchased by Carrefour, whether for resale or not, which meet a set of specifications defined by Carrefour and which are subject to a specific quality control process by Carrefour'. [CSR Commitment Charter – Controlled product suppliers, 2018: carrefour.com] • Not Met: How working with suppliers on debt &amp; fees Score 2 • Not Met: Assessment of the number affected by payment of recruitment fees • Not Met: Analysis of trends in progress made</td>
</tr>
<tr>
<td>D.1.5.d</td>
<td>Prohibition of forced labour: Wage practices (in the supply chain)</td>
<td>0</td>
<td>The individual elements of the assessment are met or not as follows: Score 1  • Not Met: Suppliers to pay workers in full and on time in codes or contracts: The Company states that suppliers shall provide all workers with written and understandable information about their employment conditions, including wages, before they enter into employment; and about details of their wages for the pay period concerned each time that they are paid. However, it does not have requirement on paying workers in full and on time. [CSR Commitment Charter – Controlled product suppliers, 2018: carrefour.com] • Not Met: How working with supply chain to pay workers regularly and on time Score 2 • Not Met: Assessment of the number affected by failure to pay directly • Not Met: Provides analysis of trends demonstrating progress</td>
</tr>
<tr>
<td>D.1.5.f</td>
<td>Prohibition of forced labour: Restrictions on workers (in the supply chain)</td>
<td>0</td>
<td>The individual elements of the assessment are met or not as follows: Score 1  • Not Met: Free movement rules in codes or contracts: The Company states that suppliers shall not require workers to make deposits/financial guarantees and shall not retain identity documents (such as passports, identity cards, etc.), nor withhold wages outside a legal contractual agreement. It is not clear, however, whether all agricultural-related suppliers are covered, the scope of 'controlled products' include the following: are products purchased by Carrefour, whether for resale or not, which meet a set of specifications defined by Carrefour and which are subject to a specific quality control process by Carrefour'. [CSR Commitment Charter – Controlled product suppliers, 2018: carrefour.com] • Not Met: How working with suppliers on free movement Score 2 • Not Met: Assessment of the number affected by retaining docs or restricting movement • Not Met: Provides analysis of trends demonstrating progress</td>
</tr>
<tr>
<td>D.1.6.b</td>
<td>Freedom of association and collective bargaining (in the supply chain)</td>
<td>0</td>
<td>The individual elements of the assessment are met or not as follows: Score 1  • Not Met: FoA &amp; CB rules in codes or contracts: The Company states that workers have the right to join or form trade unions of their own choosing and to bargain collectively, without prior authorization from suppliers’ management. Suppliers shall not interfere with, obstruct or prevent such legitimate activities. Suppliers shall not discriminate against or otherwise penalise worker representatives or trade union members because of their membership in or affiliation with a trade union, or their legitimate trade union activity, in accordance with international labour standards. It is not clear, however, whether all agricultural-related suppliers are covered, the scope of 'controlled products' include the following: are products purchased by Carrefour, whether for resale or not, which meet a set of specifications defined by Carrefour and which are subject to a specific quality control process by Carrefour'. It is not clear, however, whether all agricultural-related suppliers are covered, the scope of 'controlled products' include the following: are products purchased by Carrefour, whether for resale or not, which meet a set of specifications defined by Carrefour and which are subject to a specific quality control process by Carrefour'. [CSR Commitment Charter – Controlled product suppliers, 2018: carrefour.com] • Not Met: How working with suppliers on FoA and CB Score 2 • Not Met: Assessment of the number affected by restrictions to FoA and CB in the SP</td>
</tr>
<tr>
<td>Indicator Code</td>
<td>Indicator name</td>
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</table>
| 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  
• Not Met: Sets out clear Health and Safety requirements: The Company has listed nine health and safety principles in its supplier code. The principles include suppliers shall provide safe and clean conditions in all work and residential facilities, take adequate steps to prevent accidents and injury to health arising out of, provide access to adequate medical assistance and facilities, and so on. It is not clear, however, whether all agricultural-related suppliers are covered, the scope of 'controlled products' include the following: are products purchased by Carrefour, whether for resale or not, which meet a set of specifications defined by Carrefour and which are subject to a specific quality control process by Carrefour'. [CSR Commitment Charter – Controlled product suppliers, 2018: carrefour.com]  
• Not Met: Injury Rate or Lost days or Near miss disclosures for last reporting period  
• Not Met: Fatalities rate for lasting reporting period  
• Not Met: Occupation disease rate for last reporting period Score 2  
• Not Met: How working with suppliers on H&S  
• Not Met: Assessment of the number affected by H&S issues in the SP  
• Not Met: Provides analysis of trends demonstrating progress |
| 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  
• Not Met: Rules on land & owners in codes or contracts  
• Not Met: How working with suppliers on land issues Score 2  
• Not Met: Includes resettlement requirements that the supplier provides financial compensation  
• Not Met: Assessment of the number affected by land rights issues in its SP  
• Not Met: Provides analysis of trends demonstrating progress |
| 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  
• Not Met: Rules on water stewardship in codes or contracts: In the contractual annex for suppliers, the Company includes requirements on access to clean toilet facilities, drinkable water and sanitary facilities for food preparation and storage. However, no evidence found in relation to refraining from negatively affecting access to safe water, in line with the UN Sustainable development goals. [CSR Commitment Charter – Controlled product suppliers, 2018: carrefour.com]  
• Not Met: How working with suppliers on water stewardship issues Score 2  
• Not Met: Assessment on the number affected by lack of access to water and sanitation  
• Not Met: Provides analysis of trends demonstrating progress |
| 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  
• Not Met: Women’s rights in codes or contracts  
• Not Met: How working with suppliers on women’s rights Score 2  
• Not Met: Assessment on the number affected by discrimination or unsafe working conditions  
• Not Met: Provides analysis of trends demonstrating progress |
### E. Performance: Responses to Serious Allegations (20% of Total)

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<tr>
<th>Indicator Code</th>
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<th>Explanation</th>
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</table>
| E(1).0         | Serious allegation No 1         |                  | **• Area: Health & Safety**  
|                |                                 |                  | **• Headline: COVID-19 : Carrefour sued over employees' lacked protection amid the spread of Coronavirus in Bobigny**  
|                |                                 |                  | **• Story: On March 31st, 2020, press sources reported that The CGT Commerce union filed a complaint against Carrefour at the Bobigny judicial court and against the Minister of Labour at the Court of Justice of the Republic over allegations of lacked protection of employees against the coronavirus.**  
|                |                                 |                  | According to the press, Carrefour Hypermarkets is sued for "involuntary injury to life" and "endangering the lives of others", following the death of an employee and CGT union delegate of Covid-19 virus. The CGT also claimed that the plexiglass windows protecting the cashiers were only installed on the 20th of March 2020, and that staff were not given masks, and that all the departments were open to the public, and not just those corresponding to basic necessities. In addition, the union, in a letter sent to the court, accused Labour Minister of "inaction" and stated that the minister has "never intended to interfere in an effective manner to ensure the health and safety of employees".  
|                |                                 |                  | According to the trade union, "employees in the distribution sector are paying a heavy price for the inaction of the government and employers, with five deaths recorded to date and several hundred employees contaminated, some of them in critical situations".  
|                |                                 |                  | [Lefigaro, 31/03/2020, "Coronavirus: plaintes de la CGT Commerce contre Carrefour et Pénicaud": lefigaro.fr] [Reuters, 02/04/2020, "After death of a cashier, French supermarket staff work in fear": reuters.com]  
| E(1).1         | The company has responded publicly to the allegation | 1               | The individual elements of the assessment are met or not as follows:  
|                |                                 |                  | **• Met: Public response: In response to the allegation, Carrefour said employee safety was its top priority and that it had pre-empted government instructions and rolled out protective equipment early on. [Reuters, 02/04/2020: reuters.com]**  
|                |                                 |                  | **Score 2**  
|                |                                 |                  | **• Not Met: Detailed response: The company responded in very general terms and did not address the allegation in detail.**  
| E(1).2         | The company has investigated and taken appropriate action | 0               | The individual elements of the assessment are met or not as follows:  
|                |                                 |                  | **• Not Met: Engaged with stakeholders**  
|                |                                 |                  | **Score 2**  
|                |                                 |                  | **• Not Met: Identified cause**  
|                |                                 |                  | **Score 2**  
|                |                                 |                  | **• Not Met: Identified and implemented improvements**  
|                |                                 |                  | **Score 2**  
|                |                                 |                  | **• Not Met: Stakeholder input to steps taken**  
| E(1).3         | The company has engaged with affected stakeholders to provide for or cooperate in remedy(ies) | 0               | The individual elements of the assessment are met or not as follows:  
|                |                                 |                  | **• Not Met: Provided remedy**  
|                |                                 |                  | **Score 2**  
|                |                                 |                  | **• Not Met: Evidence for lack of Impact or link**  
|                |                                 |                  | **Score 2**  
|                |                                 |                  | **• Not Met: Remedy satisfactory to stakeholders**  
|                |                                 |                  | **Score 2**  
|                |                                 |                  | **• Not Met: Remedy delivered**  
|                |                                 |                  | **Score 2**  
|                |                                 |                  | **• Not Met: Independent remedy process used**  
| E(2).0         | Serious allegation No 2         |                  | **• Area: Forced labour; discrimination**  
|                |                                 |                  | **• Headline: Carrefour among companies accused of using suppliers linked to forced labour in China**  
|                |                                 |                  | **• Story: On March 1st., 2020, the Australian Strategic Policy Institute (ASPI) released a report that named Walmart among 83 other companies benefiting from the use of potentially abuse labour transfer programs.**  
|                |                                 |                  | According to the report, more than 80,000 Uyghur residents and former detainees from the north-western region of Xinjiang, China have been transferred to factories, implicating global supply chains. It is alleged that Muslim minorities are thought to be working in forced labour conditions across the country.  
|                |                                 |                  | The ASPI report said that workers live in segregated dormitories, are required to study Mandarin and undergo ideological training. The workers were transferred...
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</table>
| E(2).1         | The Company has responded publicly to the allegation | 1 | The individual elements of the assessment are met or not as follows:  
Score 1  
• Met: Public response: While the company did not respond to the UN Working Group and Special Rapporteurs, it did address the allegation in its 2020 Universal Registration Document, stating "The Australian Strategic Policy Institute (ASPI) published a study listing 83 companies that have benefited from the use of potentially abusive labour transfer programmes at textile plants in China. Following the publication of this article and due to the controversial situation in Xinjiang province, Carrefour confirmed that it had no suppliers located in this province and is implementing a special monitoring programme to ensure compliance with social and environmental conditions for all materials that can be produced in the province. Since 2001, Carrefour has introduced actions to protect its supplier network by conducting social audits at its finished goods production facilities. All facilities have now been audited, with the support of independent auditing firms. Carrefour condemns the use of forced labour in its supply chain. These practices violate the contractual undertakings of each of its suppliers for its own operations and the operations of its subcontractors and suppliers." [Universal registration document 2020, 2021: carrefour.com]  
Score 2  
• Not Met: Detailed response: The company has addressed the allegation in general terms only, citing the overall topic of the ASPI report, "abusive labour transfer programmes", and "the controversial situation" without addressing the exact Xinjiang Aid scheme it has been linked to in the report and the forced labour that is associated with it. [Universal registration document 2020, 2021: carrefour.com] |
| E(2).2         | The Company has appropriate policies in place | 0.5 | The individual elements of the assessment are met or not as follows:  
Score 1  
• Not Met: Engaged with stakeholders: The company states that it does not have suppliers located in the Xinjiang province and is implementing a special monitoring programme to ensure compliance with social and environmental conditions for all materials that can be produced in the province. [...] All facilities have now been audited, with the support of independent auditing firms. However, there is no information available that indicates the company engaged with individuals from the Uyghur community that have been affected by forced labour. [Universal registration document 2020, 2021: carrefour.com]  
• Not Met: Identified cause: The company states that it does not have suppliers located in the Xinjiang province and is implementing a special monitoring programme to ensure compliance with social and environmental conditions for all materials that can be produced in the province. [...] All facilities have now been audited, with the support of independent auditing firms. However, the company... |
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| E(2).3         | The Company has taken appropriate action | 0              | The individual elements of the assessment are met or not as follows:  
|                |                |                 | Score 1  
|                |                |                 | • Not Met: Provided remedy  
|                |                |                 | • Not Met: Evidence for lack of impact or link: The company denies having ties to the Xinjiang region, however, it does not present detailed evidence to support this claim.  
|                |                |                 | Score 2  
|                |                |                 | • Not Met: Remedy satisfactory to stakeholders  
|                |                |                 | • Not Met: Remedy delivered  
|                |                |                 | • Not Met: Independent remedy process used |
| E(3).0         | Serious allegation No 3 |                | • Area: Forced labour; working hours; discrimination  
|                |                |                 | • Headline: NGOs accused Carrefour and others of alleged labour abuses in India  
|                |                |                 | • Story: On May 28, 2021, a new report by NGOs Somo and Arisa found evidence across Tamil Nadu region in India of multiple labour abuses including intimidation, threats towards vulnerable female workers, abusive working and living conditions and excessive overtime.  
|                |                |                 | The report named international brands including Carrefour SA, Tesco, Next, Sainsbury’s, and Gap in which it claimed the companies were directly or indirectly linked to the mills investigated.  
|                |                |                 | A worker at one of the mills interviewed by the NGO claimed lack of sleep and excessive work where workers allegedly have to work two or three shifts. Workers also claimed severe limitations on their freedom, saying that while they were not working they had to remain in dormitories and were closely monitored. Other female workers reported feeling unsafe and being subject to sexual harassment from their male managers and supervisors.  
|                |                |                 | [The Guardian, 28/05/2021, "Tesco and Next among brands linked to labour abuses in India spinning mills": [theguardian.com] [SOMO Website, 27/05/2021, "International companies linked to forced labour in Indian spinning mills": [somo.nl] ] |
| E(3).1         | The Company has responded publicly to the allegation | 1              | The individual elements of the assessment are met or not as follows:  
|                |                |                 | Score 1  
|                |                |                 | • Met: Public response: Carrefour informed SOMO and Arisa that it had previously had a sourcing relationship with the supplier in question, but that the relationship had since ended. Carrefour did not clarify whether there had been a sourcing relationship directly with mill 7, despite SOMO’s request for clarification. [SOMO Website, 27/05/2021: [somo.nl] ]  
|                |                |                 | Score 2  
|                |                |                 | • Not Met: Detailed response: Carrefour stated: “As a consequence, we removed this supplier from our current and future supplier list and thus are cutting any future commercial relations with them”. The company thereby outlines the steps it has taken after being made aware of the allegation, however, the company fails to directly address the human rights violations that occurred. [SOMO Website, 27/05/2021: [somo.nl] ] |
| E(3).2         | The Company has appropriate policies in place | 0.5            | The individual elements of the assessment are met or not as follows:  
|                |                |                 | Score 1  
|                |                |                 | • Not Met: Engaged with stakeholders: The company states that “after receiving the draft findings of our research, it asked to visit mill 7, but was denied access by the supplier.” Therefore, the company did not have the opportunity to engage with the affected stakeholders. However, there is no evidence of the company attempting to engage with the affected stakeholders in a different location or obtain other sources of information.  
|                |                |                 | Score 2  
|                |                |                 | • Not Met: Stakeholder input to steps taken: There is no evidence that suggests the actions taken were informed by stakeholder input.  
|                |                |                 | Score 3  
|                |                |                 | E(3).3: The Company has appropriate policies in place  
|                |                |                 | • Not Met: Engaged with stakeholders: The company states that “after receiving the draft findings of our research, it asked to visit mill 7, but was denied access by the supplier.” Therefore, the company did not have the opportunity to engage with the affected stakeholders. However, there is no evidence of the company attempting to engage with the affected stakeholders in a different location or obtain other sources of information.  
|                |                |                 | Score 4  
|                |                |                 | E(3).4: The Company has appropriate policies in place  
|                |                |                 | • Not Met: Engaged with stakeholders: The company states that “after receiving the draft findings of our research, it asked to visit mill 7, but was denied access by the supplier.” Therefore, the company did not have the opportunity to engage with the affected stakeholders. However, there is no evidence of the company attempting to engage with the affected stakeholders in a different location or obtain other sources of information.  
|                |                |                 | Score 5  
|                |                |                 | E(3).5: The Company has appropriate policies in place  
|                |                |                 | • Not Met: Engaged with stakeholders: The company states that “after receiving the draft findings of our research, it asked to visit mill 7, but was denied access by the supplier.” Therefore, the company did not have the opportunity to engage with the affected stakeholders. However, there is no evidence of the company attempting to engage with the affected stakeholders in a different location or obtain other sources of information.  
|                |                |                 | Score 6  
|                |                |                 | E(3).6: The Company has appropriate policies in place  
|                |                |                 | • Not Met: Engaged with stakeholders: The company states that “after receiving the draft findings of our research, it asked to visit mill 7, but was denied access by the supplier.” Therefore, the company did not have the opportunity to engage with the affected stakeholders. However, there is no evidence of the company attempting to engage with the affected stakeholders in a different location or obtain other sources of information.  
|                |                |                 | Score 7  
|                |                |                 | E(3).7: The Company has appropriate policies in place  
|                |                |                 | • Not Met: Engaged with stakeholders: The company states that “after receiving the draft findings of our research, it asked to visit mill 7, but was denied access by the supplier.” Therefore, the company did not have the opportunity to engage with the affected stakeholders. However, there is no evidence of the company attempting to engage with the affected stakeholders in a different location or obtain other sources of information.  
|                |                |                 | Score 8  
|                |                |                 | E(3).8: The Company has appropriate policies in place  
|                |                |                 | • Not Met: Engaged with stakeholders: The company states that “after receiving the draft findings of our research, it asked to visit mill 7, but was denied access by the supplier.” Therefore, the company did not have the opportunity to engage with the affected stakeholders. However, there is no evidence of the company attempting to engage with the affected stakeholders in a different location or obtain other sources of information.  
|                |                |                 | Score 9  
|                |                |                 | E(3).9: The Company has appropriate policies in place  
|                |                |                 | • Not Met: Engaged with stakeholders: The company states that “after receiving the draft findings of our research, it asked to visit mill 7, but was denied access by the supplier.” Therefore, the company did not have the opportunity to engage with the affected stakeholders. However, there is no evidence of the company attempting to engage with the affected stakeholders in a different location or obtain other sources of information.  
<p>|                |                |                 | Score 10 |</p>
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| E(3).3         | The Company has taken appropriate action | 0                | There is no evidence suggesting the supplier carried out engagement with the affected stakeholders. [SOMO Website, 27/05/2021: somo.nl]  
- Not Met: Identified cause: The company does not present investigative results on the underlying causes of the events concerned.  
- Score 2  
- Met: Identified and implemented improvements: Carrefour stated: "As a consequence, we removed this supplier from our current and future supplier list and thus are cutting any future commercial relations with them". [SOMO Website, 27/05/2021: somo.nl]  
- Not Met: Stakeholder input to steps taken: The company was not able to get direct stakeholder input due to being denied access to the site. There is no evidence of the company attempting to engage with the affected stakeholders in a different location or obtain other sources of information. [SOMO Website, 27/05/2021: somo.nl]  
- The individual elements of the assessment are met or not as follows:  
  - Score 1  
  - Not Met: Provided remedy  
  - Not Met: Evidence for lack of Impact or link  
  - Score 2  
  - Not Met: Remedy satisfactory to stakeholders  
  - Not Met: Remedy delivered  
  - Not Met: Independent remedy process used |

**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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