

Company Name Constellation Brands
Industry Agricultural Products (Supply Chain and Own Operations)
Overall Score 1.8 out of 100

Theme Score	Out of	For Theme
0.2	10	A. Governance and Policies
0.0	25	B. Embedding Respect and Human Rights Due Diligence
1.0	20	C. Remedies and Grievance Mechanisms
0.3	25	D. Performance: Company Human Rights Practices
0.4	20	E. Performance: Responses to Serious Allegations

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

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

Detailed assessment

A. Governance and Policies (10% of Total)

A.1 Policy Commitments (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1.1	Commitment to respect human rights	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not Met: General HRs commitment: The Code of Conduct states that 'Constellation Brands is committed to maintaining and promoting human rights and respecting the rights of workers throughout the Company'. However, the commitment is focused only on its own workers. [Code of Business Conduct and Ethics, 2021: dlus3r1ggbdsn.cloudfront.net] Not Met: Universal Declaration of Human rights (UDHR) Not Met: International Bill of Human Rights Score 2 <ul style="list-style-type: none"> Not Met: Commitment to the UNGPs Not Met: Commitment to the OECD Guidelines for Multinational Enterprises
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"> Not Met: Company has a commitment to the ILO Core Not Met: Company has an explicit commitment to All four ILO Core: The Code states that 'Prohibits child labor, forced labor, slavery, and human trafficking. Constellation Brands only employs individuals of legal working age and complies with all relevant International Labor Organization standards. [...] Respects an employees' right to associate or not to associate with any group, as permitted by and in accordance with applicable laws and regulations. [...] Constellation Brands is committed to a continuing program of equal employment opportunity. All persons have equal employment opportunities with Constellation Brands'. However, it is not clear whether it is committed to respect the rights of freedom of association and collective bargaining in all contexts and locations (i.e. alternative mechanisms for those countries where there are legal restrictions to the exercise of these

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			rights), as the Company indicates that it respects these rights 'in accordance with applicable laws and regulations'. [Code of Business Conduct and Ethics, 2021: dlus3r1ggbdns.cloudfront.net] Score 2 <ul style="list-style-type: none"> • Not Met: Company expect suppliers to commit to ILO Core • Not Met: Company explicitly list All four ILO for suppliers: The Company states in its Supplier Code of Conduct that its suppliers shall encourage a diverse workforce that is free from all forms of discrimination and harassment, shall not engage in human trafficking, slavery, or use forced labour, shall not employ anyone under the legal minimum age and Suppliers shall comply with all relevant International Labor Organization standards. Suppliers shall not restrict, including through direct or indirect coercion, the right of workers to join or refrain from joining associations and worker organizations. However, no requirement to respect the rights of freedom of association and collective bargaining was found. [Supplier Code of Conduct and Sustainability Guidelines, 12/12/2018: dlus3r1ggbdns.cloudfront.net]
A.1.2.b	Commitment to respect the human rights of workers: Health and safety and working hours	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Commitment to respect H&S of workers: The Code states that 'Constellation Brands is committed to the health and safety of its employees'. [Code of Business Conduct and Ethics, 2021: dlus3r1ggbdns.cloudfront.net] • Not Met: Respect ILO labour standards on working hours or Commits to 48 hours regular work week: The Code states that it 'Complies with all applicable wage, benefits, and hour laws, including minimum wage, maximum hours, and the payment of compensation for overtime hours'. However, no evidence found of the Company explicitly committing to respect ILO conventions on working hours or that publicly states that workers are not required to work more than 48 hours as regular working week, and that overtime is consensual and paid at a premium rate. [Code of Business Conduct and Ethics, 2021: dlus3r1ggbdns.cloudfront.net] Score 2 <ul style="list-style-type: none"> • Met: Expect suppliers to commit to H&S of their workers: The Company states in its Code of Conduct that its suppliers shall provide a safe and healthy working environment, including fully-functioning water, sanitization, and hygiene services for all workers. [Supplier Code of Conduct and Sustainability Guidelines, 12/12/2018: dlus3r1ggbdns.cloudfront.net] • Not Met: Expect suppliers to commit to ILO labour standard or to 48 hours regular work week: The Company indicates in its Supplier Code: 'Suppliers shall comply with all standards set by law regarding working hours, wages, benefits and overtime pay practices, including minimum wage and the payment of compensation for overtime hours'. 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 Code of Conduct and Sustainability Guidelines, 12/12/2018: dlus3r1ggbdns.cloudfront.net]
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 <ul style="list-style-type: none"> • 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 <ul style="list-style-type: none"> • 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 <ul style="list-style-type: none"> • Not Met: Women's rights • 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 <ul style="list-style-type: none"> • Not Met: CEDAW/Women's Empowerment Principles • Not Met: Child Rights Convention/Business Principles • Not Met: Convention on migrant workers • Not Met: Expecting suppliers to respect these rights

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1.4	Commitment to remedy	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: The Company commits to remedy • Not Met: Company expect suppliers to make this commitment Score 2 <ul style="list-style-type: none"> • 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 <ul style="list-style-type: none"> • Not Met: Zero tolerance attacks on HRs Defenders (HRDs) • Not Met: Company expect suppliers to make this commitment Score 2 <ul style="list-style-type: none"> • 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 <ul style="list-style-type: none"> • Not Met: Board level responsibility for HRs: The company indicates that 'Managers and supervisors have an extended responsibility to help the Company conduct business in an ethical and responsible manner. Managers and supervisors are expected to be role models and assist employees in understanding their expectations. ' However, no further information found on Board level responsibility for human rights. [Code of Business Conduct and Ethics, 2021: dplus3r1ggbdns.cloudfront.net] Score 2 <ul style="list-style-type: none"> • Not Met: Describe HR expertise of Board member • 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 <ul style="list-style-type: none"> • Not Met: Board/Committee review HRs strategy • Not Met: Examples/trends re HR discussion in the last reporting period Score 2 <ul style="list-style-type: none"> • 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 <ul style="list-style-type: none"> • Not Met: Incentives for at least one board member • Not Met: At least one key HR risk, beyond employee H&S Score 2 <ul style="list-style-type: none"> • 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 <ul style="list-style-type: none"> • Not Met: Board process to review bussiness model and strategy [2021 CSR Report, 2021: cbrands.com] Score 2 <ul style="list-style-type: none"> • Not Met: Describe frequency and triggers for reviewing • 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 <ul style="list-style-type: none"> • Not Met: Score of 1 on A.1.2.a • Not Met: Senior responsibility for HR implementation and decision making Score 2 <ul style="list-style-type: none"> • Not Met: How it assigns Day-to-day responsibility • Not Met: Day-to-day resources and expertise allocation in own ops [Code of Business Conduct and Ethics, 2021: dplus3r1ggbdns.cloudfront.net] • Not Met: Resources and expertise allocation in the supply chain

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.2	Incentives and performance management	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Senior manager incentives for human rights • Not Met: At least one key HR risk, beyond employee H&S Score 2 <ul style="list-style-type: none"> • 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 <ul style="list-style-type: none"> • Not Met: HR risks is integrated as part of enterprise risk system [Code of Business Conduct and Ethics, 2021: dlus3r1ggbdsn.cloudfront.net] • Not Met: Provides an example Score 2 <ul style="list-style-type: none"> • 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 <ul style="list-style-type: none"> • Not Met: Score of 1 on A.1.2.a • Not Met: Communicates its policy to all workers in own operations Score 2 <ul style="list-style-type: none"> • Not Met: Communication of policy commitments to stakeholder [Code of Business Conduct and Ethics, 2021: dlus3r1ggbdsn.cloudfront.net] • 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 <ul style="list-style-type: none"> • Not Met: Meets ILO requirement for suppliers on A.1.2.a • Not Met: Steps to communicate policy commitments to supply chain • Not Met: Requires suppliers to communicate policy requirements Score 2 <ul style="list-style-type: none"> • 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 <ul style="list-style-type: none"> • Not Met: Scores at least 1 on A.1.2.a • Not Met: How workers are trained on HR policy commitments • Not Met: Trains relevant managers including procurement Score 2 <ul style="list-style-type: none"> • 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 [Fiscal Year 2021 Summary Annual Report, 2021: cbrands.gcs-web.com] • 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 <ul style="list-style-type: none"> • 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 • Not Met: Proportion of supply chain monitored • Not Met: Describe how workers are involved in monitoring Score 2 <ul style="list-style-type: none"> • Not Met: Score of 2 on 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 <ul style="list-style-type: none"> • Not Met: HR affects selection of suppliers • Not Met: HR affects on-going supplier relationships Score 2 <ul style="list-style-type: none"> • 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 <ul style="list-style-type: none"> • 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 <ul style="list-style-type: none"> • 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	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Identifying risks in own operations • Not Met: Identifying risks through relevant business relationships Score 2 <ul style="list-style-type: none"> • 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 <ul style="list-style-type: none"> • 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 <ul style="list-style-type: none"> • 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 <ul style="list-style-type: none"> • 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 Score 2 <ul style="list-style-type: none"> • 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 <ul style="list-style-type: none"> • Not Met: System for tracking or monitor if actions taken are effective • Not Met: Lessons learnt from checking system effectiveness Score 2 <ul style="list-style-type: none"> • 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 <ul style="list-style-type: none"> • Not Met: Provides two examples of comms with stakeholders Score 2 <ul style="list-style-type: none"> • 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 <ul style="list-style-type: none"> • Met: Channel accessible to all workers: The Company states in its Code of Conduct that it has the Ethics and Compliance Hotline, an independent reporting service available 24 hours a day, 7 days a week. A professional specialist will document reporters' concern and relay the information to the company for follow-up. Callers may choose to remain anonymous. [Code of Business Conduct and Ethics, 2021: dlus3r1ggbdns.cloudfront.net] Score 2 <ul style="list-style-type: none"> • Not Met: Channel is available in all appropriate languages and workers aware: The Company has listed various number for different regions including USA, Canada, international, Mexico, Italy, and New Zealand. However, not clear if workers can report of those languages or if workers are aware. [Code of Business Conduct and Ethics, 2021: dlus3r1ggbdns.cloudfront.net] • Not Met: Describe how workers in the supply chain have access to grievance mechanism: The Company states in its Supplier Code of Conduct that " Employees can confidentially report concerns to their manager or supervisor, Human Resources department, Legal department, Corporate Compliance organization or by calling the Ethics and Compliance Helpline. You may choose to remain anonymous." However, it is not clear if workers in the supply chain have access to this channel. [Supplier Code of Conduct and Sustainability Guidelines, 12/12/2018: dlus3r1ggbdns.cloudfront.net] • Not Met: Expect Suppliers to convey expectation to their own suppliers

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.2	Grievance channel(s)/mechanism(s) to receive complaints or concerns from external individuals and communities	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not Met: Grievance mechanism for community: The company states that 'Employees can report any violation or suspected violation by calling the toll-free Ethics and Compliance Helpline. All calls are confidential, and you may choose to remain anonymous.' However, there is no mention if communities have access to this channel. [Code of Business Conduct and Ethics, 2021: dlus3r1ggbdns.cloudfront.net] Score 2 <ul style="list-style-type: none"> Not Met: Describes accessibility and local languages and stakeholder awareness Not Met: Communities access mechanism direct or through suppliers Not Met: Expect supplier to convey expectation to their own suppliers
C.3	Users are involved in the design and performance of the channel(s)/mechanism(s)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not Met: Engages users to create or assess system Not Met: Examples (at least two) of how they do this Score 2 <ul style="list-style-type: none"> Not Met: Engages with potential or actual users on the improvement of the mechanism Not Met: Provides user engagement example (at least two) on improvement
C.4	Procedures related to the mechanism(s)/channel(s) are equitable, publicly available and explained	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not Met: Response timescales and how complainants will be informed: The Company indicates in its Code of Business Conduct and Ethics that 'Constellation takes all reported concerns seriously and investigates as appropriate. As part of the investigation process, employees may be asked to provide information pertaining to the alleged incident.' However, there is no information of timescales and how complainants will be informed. [Code of Business Conduct and Ethics, 2021: dlus3r1ggbdns.cloudfront.net] Not Met: Describe support (technical, financial, etc) available for equal access by complainants Score 2 <ul style="list-style-type: none"> 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 <ul style="list-style-type: none"> Not Met: Public statement prohibiting retaliation: The company state that 'Constellation Brands will protect employees who, in good faith, report concerns from retaliatory actions. Retaliatory or intimidating behavior of any kind is strictly prohibited.' However, it is not clear if this commitment includes other stakeholders/company's representatives. [Code of Business Conduct and Ethics, 2021: dlus3r1ggbdns.cloudfront.net] Not Met: Practical measures to prevent retaliation Score 2 <ul style="list-style-type: none"> 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 <ul style="list-style-type: none"> Not Met: Complainants not asked to waive rights Not Met: Company does not require confidentiality provisions Score 2 <ul style="list-style-type: none"> Not Met: Will work with state based non judicial mechanisms Not Met: Example of issue resolved (if applicable)
C.7	Remedying adverse impacts	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> 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 <ul style="list-style-type: none"> 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	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not Met: Number grievances filed, addressed or resolved and outcome achieved Not Met: How lessons from mechanism improve management system

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

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.1.1.a	Living wage (in own production or manufacturing operations)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Pays living wage or sets target date • Not Met: Describes how living wage determined Score 2 <ul style="list-style-type: none"> • Not Met: Achieved paying a living wage • Not Met: Definition of living wage reviewed with unions
D.1.1.b	Living wage (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Discloses timebound target for suppliers to pay living wage or include in code or contracts • Not Met: Improving living wage practices of suppliers Score 2 <ul style="list-style-type: none"> • Not Met: Assessment of number affected by payment below living wage • Not Met: Provides analysis of trends demonstrating progress
D.1.2	Aligning purchasing decisions with human rights	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Avoids business model pressure on HRs (purchasing practices) • Not Met: Practices adopted to pay suppliers in line with agreed timeframes • Not Met: Review own operations to mitigate negative impact Score 2 <ul style="list-style-type: none"> • Not Met: Meets all requirements under score 1 • Not Met: Examples of how it assessed, addressed and change purchasing practices
D.1.3	Mapping and disclosing the supply chain	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Identifies direct and indirect suppliers back to manufacturing sites (factories or fields) Score 2 <ul style="list-style-type: none"> • Not Met: Discloses names and locations of significant parts of SP and why • Not Met: Discloses which direct or indirect suppliers is involved in higher-risk activities
D.1.4.a	Prohibition of child labour: Age verification and corrective actions (in own production or manufacturing operations)	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Does not use child labour: The Company states in its Code of Business Conduct and Ethics that 'Prohibits child labor, forced labor, slavery, and human trafficking. Constellation Brands only employs individuals of legal working age and complies with all relevant International Labor Organization standards.' [Code of Business Conduct and Ethics, 2021: dlus3r1ggbdn.cloudfront.net] • Not Met: Age verification of workers recruited Score 2 <ul style="list-style-type: none"> • Not Met: Remediation if children identified
D.1.4.b	Prohibition of child labour: Age verification and corrective actions (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Child Labour rules in codes or contracts • Not Met: How working with suppliers on child labour Score 2 <ul style="list-style-type: none"> • Not Met: Assessment of number affected by child labour in supply chain • Not Met: Analysis of trends in progress made
D.1.5.a	Prohibition of forced labour: recruitment fees and costs (in own production or manufacturing operations)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Job seekers and workers do not pay recruitment fee • Not Met: Commits to fully reimbursing if they have paid Score 2 <ul style="list-style-type: none"> • Not Met: How practices are implemented and monitored for agencies, labour brokers or recruiters

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.1.5.b	Prohibition of forced labour: Recruitment fees and costs (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Debt and fees rules in codes or contracts • Not Met: How working with suppliers on debt & fees Score 2 <ul style="list-style-type: none"> • Not Met: Assessment of the number affected by payment of recruitment fees • Not Met: Analysis of trends in progress made
D.1.5.c	Prohibition of forced labour: Wage practices (in own production or manufacturing operations)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Pays workers in full and on time • Not Met: Payslips show any legitimate deductions Score 2 <ul style="list-style-type: none"> • Not Met: How these practices are monitored for agencies, labour brokers or recruiters
D.1.5.d	Prohibition of forced labour: Wage practices (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Suppliers to pay workers in full and on time in codes or contracts • Not Met: How working with supply chain to pay workers regularly and on time Score 2 <ul style="list-style-type: none"> • Not Met: Assessment of the number affected by failure to pay directly • Not Met: Provides analysis of trends demonstrating progress
D.1.5.e	Prohibition of forced labour: Restrictions on workers (in own production or manufacturing operations)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Does not retain documents or restrict movement Score 2 <ul style="list-style-type: none"> • Not Met: How these practices are monitored for agencies, labour brokers or recruiters
D.1.5.f	Prohibition of forced labour: Restrictions on workers (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Free movement rules in codes or contracts • Not Met: How working with suppliers on free movement Score 2 <ul style="list-style-type: none"> • Not Met: Assessment of the number affected by retaining docs or restricting movement • Not Met: Provides analysis of trends demonstrating progress
D.1.6.a	Freedom of association and collective bargaining (in own production or manufacturing operation)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Commits not to interfere with union rights / Steps to avoid intimidation or retaliation: The Company states in its Code of Business Conduct and Ethics that 'Respects an employees' right to associate or not to associate with any group, as permitted by and in accordance with applicable laws and regulations'. However, no further information found as well as there is no information about unions or steps to avoid retaliation/intimidation. [Code of Business Conduct and Ethics, 2021: dlus3r1ggbdns.cloudfront.net] Score 2 <ul style="list-style-type: none"> • Not Met: Discloses % total direct operations covered by collective CB agreements • Not Met: Meets both requirements under score 1
D.1.6.b	Freedom of association and collective bargaining (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: FoA & CB rules in codes or contracts • Not Met: How working with suppliers on FoA and CB Score 2 <ul style="list-style-type: none"> • Not Met: Assessment of the number affected by restrictions to FoA and CB in the SP • Not Met: Provides analysis of trends demonstrating progress

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.1.7.a	Health and safety: Fatalities, lost days, injury, occupational disease rates (in own production or manufacturing operations)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Describes process to identify H&S risks and impacts • Not Met: Injury Rate or Lost days or Near miss disclosures for last reporting period • Not Met: Fatalities for lasting reporting period • Not Met: Occupational disease rate for last reporting period Score 2 <ul style="list-style-type: none"> • Not Met: Set targets for H&S performance • Not Met: Met targets or explains why not or how improve management systems
D.1.7.b	Health and safety: Fatalities, lost days, injury, occupational disease rates (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Sets out clear Health and Safety requirements: The Company states in its Code of Conduct that its suppliers shall provide a safe and healthy working environment, including fully-functioning water, sanitization, and hygiene services for all workers; complying laws concerning safe working conditions, provide protective safety equipment and safeguards on machinery, train workers, etc. However, not clear how these are included in contractual arrangements. [Code of Business Conduct and Ethics, 2021: dlus3r1ggbdns.cloudfront.net] • 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 <ul style="list-style-type: none"> • 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.a	Land rights: Land acquisition (in own production or manufacturing operations)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Approach to identification of land tenure rights holders Score 2 <ul style="list-style-type: none"> • Not Met: How valuation and compensation works • Not Met: Follows IFC PS 5 in any state land deals
D.1.8.b	Land rights: Land acquisition (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Rules on land & owners in codes or contracts • Not Met: How working with suppliers on land issues Score 2 <ul style="list-style-type: none"> • 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.a	Water and sanitation (in own production or manufacturing operations)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Action to prevent water and sanitation risks: The Company states in its Code of Business Conduct and Ethics that 'We are committed to serving as responsible stewards of water through efficient use at all of our facilities, maintaining source availability and quality, working with our business and community partners on conservation efforts, and transparent reporting.' However, no further information found on what are the actions the company has taken to prevent water and sanitation risks. [Code of Business Conduct and Ethics, 2021: dlus3r1ggbdns.cloudfront.net] Score 2 <ul style="list-style-type: none"> • Not Met: Water targets considering local factors • Not Met: Reports progress and shows trends in progress made
D.1.9.b	Water and sanitation (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Rules on water stewardship in codes or contracts • Not Met: How working with suppliers on water stewardship issues Score 2 <ul style="list-style-type: none"> • Not Met: Assessment on the number affected by lack of access to water and sanitation • Not Met: Provides analysis of trends demonstrating progress

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.1.10.a	Women's rights (in own production or manufacturing operations)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Process to stop harassment and violence against women • Not Met: Working conditions take account of gender • Not Met: Measures and steps to address gender pay gap at all levels of employment Score 2 <ul style="list-style-type: none"> • Not Met: Meets all requirements under score 1 • Not Met: Provides analysis of trends demonstrating closing gender pay gap
D.1.10.b	Women's rights (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Women's rights in codes or contracts [Supplier Code of Conduct and Sustainability Guidelines, 12/12/2018: dlus3r1ggbdns.cloudfront.net] • Not Met: How working with suppliers on women's rights Score 2 <ul style="list-style-type: none"> • 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)

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 1.47 out of 80 points scored in themes A-D has been applied to produce a score of 0.37 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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