

**Corporate Human Rights Benchmark  
2022 Company Scoresheet**

**Company Name** Hon Hai Precision Industry Co., Ltd. (Foxconn)  
**Industry** ICT (Own operations and Supply Chain)  
**Overall Score** 7.6 out of 100

Theme Score	Out of	For Theme
1.6	10	A. Governance and Policies
0.9	25	B. Embedding Respect and Human Rights Due Diligence
1.5	20	C. Remedies and Grievance Mechanisms
2.1	25	D. Performance: Company Human Rights Practices
1.5	20	E. Performance: Responses to Serious Allegations

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

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

**Detailed assessment**

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

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1.1	Commitment to respect human rights	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Met: General HRs commitment: In its Code of Conduct Policy, the Company states that it 'is committed to uphold the human rights of workers, and to treat them with dignity and respect as understood by the international community. This applies to all workers including temporary, migrant, student, contract, direct employees, and any other type of worker'. [Code of Conduct, 2021: <a href="https://www.honhai.com">honhai.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Not Met: Commitment to the UNGPs</li> <li>Not Met: Commitment to the OECD Guidelines for Multinational Enterprises</li> </ul>
A.1.2.a	Commitment to respect the human rights of workers: ILO Declaration on Fundamental Principles and Rights at Work	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Not Met: Company has a commitment to the ILO Core: The Code of Conduct Policy includes provisions for all ILO core: Non-Discrimination; Child Labor Prohibition and Young Workers Protection; Freely Chosen Employment; and with respect freedom of association and collective bargaining, it indicates: 'In conformance with local law, Foxconn respects the right of all workers to form and join labor unions of their own choosing, to bargain collectively and to engage in peaceful assembly as well as respect the right of workers to refrain from such activities'. However, it is not clear whether it is committed to respect these rights in all contexts and locations (i.e. alternative mechanisms for those countries where there are legal restrictions to the exercise of these rights), as the Company indicates that it respects these rights 'in conformance with local laws'. [Code of Conduct, 2021: <a href="https://www.honhai.com">honhai.com</a>]</li> <li>Not Met: Company has an explicit commitment to All four ILO Core: See above [Code of Conduct, 2021: <a href="https://www.honhai.com">honhai.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Company expect suppliers to commit to ILO Core</li> <li>• Not Met: Company explicitly list All four ILO for suppliers: See above. In addition, the Company states: 'Foxconn's downstream suppliers are required to comply with this CoC policy to the same level of standards which the supply-chain partners and industrial associations set for the ICT industry'. [Code of Conduct, 2021: <a href="http://hionhai.com">hionhai.com</a>]</li> </ul>
A.1.2.b	Commitment to respect the human rights of workers: Health and safety and working hours	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Commitment to respect H&amp;S of workers: The Code also includes provisions to respect Health and Safety of workers, including the following topics: Machine Safeguarding; Industrial Hygiene; Occupational Safety; Emergency Preparedness; Occupational Injury and Illness; Ergonomics; Sanitation, Food, and Housing; and Health and Safety Communication. [Code of Conduct, 2021: <a href="http://hionhai.com">hionhai.com</a>]</li> <li>• Not Met: Respect ILO labour standards on working hours or Commits to 48 hours regular work week: With respect Working hours, the Company indicates in its Code: 'Except in emergency under some unusual situations, a workweek shall be restricted to 60 hours including overtime, and workers shall be allowed at least one day off for every six days worked as stipulated in the RBA CoC. [...] In addition, overtime shall be voluntary, and vacation, leave periods, and holidays should be rendered consistently with applicable laws and regulations'. 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 Conduct, 2021: <a href="http://hionhai.com">hionhai.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Expect suppliers to commit to H&amp;S of their workers: The company Code of Conduct indicates: 'Foxconn's downstream suppliers are required to comply with this CoC policy to the same level of standards which the supply-chain partners and industrial associations set for the ICT industry.' [Code of Conduct, 2021: <a href="http://hionhai.com">hionhai.com</a>]</li> <li>• Not Met: Expect suppliers to commit to ILO labour standard or to 48 hours regular work week [Code of Conduct, 2021: <a href="http://hionhai.com">hionhai.com</a>]</li> </ul>
A.1.3.a.ICT	Commitment to respect human rights particularly relevant to the industry – responsible sourcing of minerals (ICT)	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Responsible mineral sourcing: In its Code of Conduct, the Company states: 'Foxconn adheres to international standards and governmental and nongovernmental regulations on conflict minerals. Foxconn does not accept, and does not use, conflict minerals in our operations. Foxconn requires suppliers to trace the origin of products potentially containing conflict minerals, including gold (Au), tantalum (Ta), tin (Sn), and tungsten (W), and to provide all relevant information regarding the sources of those minerals to our company.' However, no evidence found of a specific commitment to responsible sourcing of conflict minerals. [Code of Conduct, 2021: <a href="http://hionhai.com">hionhai.com</a>]</li> <li>• Not Met: Based on OECD Guidance</li> <li>• Met: Requires suppliers to commit to responsible mineral sourcing: See above. 'In addition, Foxconn's suppliers are required to fulfil their due diligence on conflict-free minerals pursuant to the relevant international standards and regulations, such as Organization for Economic Co-operation and Development (OECD) Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas or an equivalent and recognized due diligence framework.' [Code of Conduct, 2021: <a href="http://hionhai.com">hionhai.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Commits to follow OECD Guidance for all minerals</li> <li>• Not Met: Suppliers expected to make similar requirements of their suppliers</li> </ul>
A.1.3.b.ICT	Commitment to respect human rights particularly relevant to the industry – vulnerable groups (ICT)	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Women's rights: The Company indicates that it 'is committed to protecting female workers' rights and health'. [Code of Conduct, 2021: <a href="http://hionhai.com">hionhai.com</a>]</li> <li>• Not Met: Children's rights</li> <li>• Not Met: Migrant worker's rights</li> <li>• Met: Expects suppliers to respect at least one of these rights: See above. In addition, the Code indicates: 'Foxconn's downstream suppliers are required to comply with this CoC policy to the same level of standards which the supply-chain partners and industrial associations set for the ICT industry.' [Code of Conduct, 2021: <a href="http://hionhai.com">hionhai.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: CEDAW/Women's Empowerment Principles</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Not Met: Child Rights Convention/Business Principles</li> <li>• Not Met: Convention on migrant workers</li> <li>• Not Met: Expecting suppliers to respect these rights</li> </ul>
A.1.4	Commitment to remedy	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: The Company commits to remedy</li> <li>• Not Met: Company expect suppliers to make this commitment</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Collaborating with other remedy initiatives</li> <li>• Not Met: Work with suppliers to remedy impact</li> </ul>
A.1.5	Commitment to respect the rights of human rights defenders	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Zero tolerance attacks on HRs Defenders (HRDs)</li> <li>• Not Met: Company expect suppliers to make this commitment</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Work with HRD to create safe and enabling environment</li> </ul>

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.2.1	Commitment from the top	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Board level responsibility for HRs: The Company states that 'The Sustainability Committee reports periodically to the Chairman and implementation results of corporate sustainability items are reported to the Board at least once a year'. The Sustainability committee oversees human rights issues. [CSR Report 2021, 2022: <a href="https://www.honhai.com">honhai.com</a>]</li> <li>• Not Met: Describe HR expertise of Board member</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Speeches/letters by Board members or CEO</li> </ul>
A.2.2	Board responsibility	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Board/Committee review HRs strategy</li> <li>• Not Met: Examples/trends re HR discussion in the last reporting period</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Meets both requirements under score 1</li> <li>• Not Met: How affected stakeholders/HR experts informed discussions</li> </ul>
A.2.3	Incentives and performance management	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Incentives for at least one board member</li> <li>• Not Met: At least one key HR risk, beyond employee H&amp;S</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Performance criteria made public</li> <li>• Not Met: Review of other board performance criteria</li> </ul>
A.2.4	Business model strategy and risks	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Board process to review bussiness model and strategy</li> <li>• Not Met: Describe frequency and triggers for reviewing</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Meets both requirements under score 1</li> <li>• Not Met: Example of actions decided</li> </ul>

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

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.1	Responsibility and resources for day-to-day human rights functions	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Score of 1 on A.1.2.a</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Met: Senior responsibility for HR implementation and decision making: The company indicates 'The Sustainability Committee organizes internal audit activities each year and convenes personnel from dedicated units including human resources, safety management, hygiene management, environmental management, and administrative affairs. Internal audits for labor, ethics, health and safety, environment, and management systems are conducted at each campus in accordance with RBA standards to ensure compliance with sustainability policies and guidelines. We conduct internal campus audits each year to ensure that the Group's sustainability policies and guidelines are implemented and executed at all Campuses.' [CSR Report 2021, 2022: <a href="http://hnhai.com">hnhai.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: How it assigns Day-to-day responsibility: See above. In addition, it states: 'each business group under the Group has established promotion sub-committees as well as a dedicated ESG team composed of more than 1,000 people from Campuses all around the world to interact closely with clients, the government, and all sectors of society, enhancing corporate transparency as part of our comprehensive commitment to implementation of Group sustainability policies which are monitored by the Sustainability Committee.' [CSR Report 2021, 2022: <a href="http://hnhai.com">hnhai.com</a>]</li> <li>• Not Met: Day-to-day resources and expertise allocation in own ops</li> <li>• Not Met: Resources and expertise allocation in the supply chain</li> </ul>
B.1.2	Incentives and performance management	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Senior manager incentives for human rights</li> <li>• Not Met: At least one key HR risk, beyond employee H&amp;S</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Performance criteria made public</li> <li>• Not Met: Review of other senior management performance</li> </ul>
B.1.3	Integration with enterprise risk management	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: HR risks is integrated as part of enterprise risk system</li> <li>• Not Met: Provides an example</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Audit Ctte or independent risk assessment</li> </ul>
B.1.4.a	Communication /dissemination of policy commitment(s) to workers and external stakeholders	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Score of 1 on A.1.2.a</li> <li>• Not Met: Communicates its policy to all workers in own operations: The company states 'Our Code of Conduct training course is mandatory for all recruits that enter the company each year, and we continue to promote Code of Conduct compliance to existing employees.' However, it is unclear if the training is provided in local languages. [CSR Report 2021, 2022: <a href="http://hnhai.com">hnhai.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Communication of policy commitments to stakeholder</li> <li>• Not Met: How policy commitments are made accessible to audience</li> </ul>
B.1.4.b	Communication /dissemination of policy commitment(s) to business relationships	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Meets ILO requirement for suppliers on A.1.2.a</li> <li>• Not Met: Steps to communicate policy commitments to supply chain</li> <li>• Met: Requires suppliers to communicate policy requirements: Suppliers need to comply with the code. The Code of Conduct requires 'A process to communicate Code requirements to suppliers and to monitor supplier compliance to the Code'. In previous report, the Company stated that 'Foxconn requires suppliers to fulfil their social and environmental responsibilities and implement sustainability practices, in addition to adhering to our Supplier Code of Conduct.' Suppliers need to meet the code/supplier code. [Code of Conduct, 2021: <a href="http://hnhai.com">hnhai.com</a>] &amp; [CSR Report 2019, 2019: <a href="http://foxconn.com">foxconn.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: How HR commitments made binding/contractual</li> <li>• Not Met: Company requires suppliers to cascade down to their suppliers</li> </ul>
B.1.5	Training on Human Rights	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Scores at least 1 on A.1.2.a</li> <li>• Not Met: How workers are trained on HR policy commitments</li> <li>• Not Met: Trains relevant managers including procurement</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Score of 2 on A.1.2.a</li> <li>• Not Met: Meets both requirements under score 1</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Not Met: Trains suppliers to meet company's HR commitment</li> <li>• Not Met: Disclose % trained</li> </ul>
B.1.6	Monitoring and corrective actions	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Scores at least 1 on A.1.2.a</li> <li>• Not Met: Monitoring implementation of HR policy commitments across global ops and supply chain: In its Code of Conduct the company indicates 'The Chairman of the Foxconn CSR Committee and all business group heads (general managers) are the main sponsors of this CoC policy. The executive of Foxconn CSR Committee will monitor adherence to this CoC policy under the guidance of the FGSC Chairman. The CSR teams of all business groups are responsible for entrenching and monitoring compliance with this Code, and providing feedback to FGSC regarding local practices contravening the CoC policy. [...] Foxconn internal audits are carried out by using internal professional staff teams or by resorting to external third-party service institutes annually or quarterly as per the Group's demands. Audits cover the areas of labor, ethics, environment, health and safety, and CSR management systems, which are required under the RBA standard.' However, no information was found relating to supply chains. [Code of Conduct, 2021: <a href="http://hionhai.com">hionhai.com</a>]</li> <li>• Not Met: Proportion of supply chain monitored: The company states that 'In 2021, we conducted audits on a total of 86 major suppliers. Audit results for these suppliers only contained non-zero-tolerance deficits, and improvement plans and measures were required within a time limit.' However, no information was found on the proportion of the supply chain represented by the audited suppliers. [CSR Report 2021, 2022: <a href="http://hionhai.com">hionhai.com</a>]</li> <li>• Not Met: Describe how workers are involved in monitoring</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Score of 2 on A.1.2.a</li> <li>• Not Met: Describes corrective action process: The company indicates 'improvement plans and measures were required within a time limit. The Group will continue to track and improve upon these supplier deficits' However, no evidence found about the corrective action process. [CSR Report 2021, 2022: <a href="http://hionhai.com">hionhai.com</a>]</li> <li>• Not Met: Disclose findings and number of corrective action</li> </ul>
B.1.7	Engaging and terminating business relationships	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: HR affects selection of suppliers: The Company states in its CSR Report 2021, that 'new suppliers must pass risk assessments for social and environmental responsibilities, and sign a statement of compliance with the Group Code of Conduct and Vendor Commitment to confirm that they can meet the various specifications of our supply chain, and understand and comply with specific the Group requirements regarding responsible supply chain management.' However, there is no further information describing how human rights performance is taken into account. [CSR Report 2021, 2022: <a href="http://hionhai.com">hionhai.com</a>]</li> <li>• Not Met: HR affects on-going supplier relationships: The Company indicates: 'Regular online surveys and on-site audits of suppliers are conducted through our supplier management platform. If zero-tolerance deficits are found during audits, suppliers will lose the right to be selected for new cases; for non-zero-tolerance deficits, suppliers will be allowed to provide improvement plans and measures within a stipulated deadline based on the severity of the deficit. Reviews are carried out for serious issues. Suppliers who do not complete improvements within allotted times will be included in our list of suppliers restricted for poor performance.' The zero-tolerance actions include use of child and forced labor. However, it is not clear how the supplier's performance affect the decisions to renew, expand or terminate business relations. [CSR Report 2021, 2022: <a href="http://hionhai.com">hionhai.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Describe positive incentives offered to respect human rights</li> <li>• Not Met: Working with suppliers to meet HR requirements</li> </ul>
B.1.8	Approach to engagement with affected stakeholders	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Stakeholder process or systems to identify and engage with workers/communities in the last two years: In its website section 'Stakeholder engagement', the Company indicates that its 'stakeholders are identified based on the AA1000 Stakeholder Engagement Standards. Members from Foxconn's SER Committee and other relevant personnel have identified key stakeholders for the Group through a stakeholder engagement assessment, which evaluates five core components, including both the dependence and influence of the stakeholder on</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Foxconn, responsibility of our Group towards the stakeholder, level of stakeholder interest, and feedback provided to our company. Based on this assessment, Foxconn has identified employees, customers, suppliers, the community, shareholders and investors, and NGOs as our key stakeholders. Foxconn has developed various communication channels to engage with our stakeholders to better understand their expectations of Foxconn and to learn from their best practices and feedback.' The Company also discloses for each stakeholder a list of topics and issues and 'efforts and outcomes'. [Stakeholder engagement, N/A: <a href="http://ser.foxconn.com">ser.foxconn.com</a>]</p> <ul style="list-style-type: none"> <li>• Not Met: Discloses stakeholders that HRs may be affected</li> <li>• Not Met: Provides two examples of engagement with stakeholders</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Analysis of stakeholder views on company's HR issues</li> <li>• Not Met: Describe how views influenced company's HR approach</li> </ul>

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.1	Identifying human rights risks and impacts	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Identifying risks in own operations: Against its Human Rights Policy, the Company states that conducts annual risk assessment and audits. Additionally, it states that requires relevant units to implement timely improvements to ensure the rights to ensure the rights and benefits of its employees. However, no further details against human rights risks identification found. [CSR Report 2019, 2019: <a href="http://foxconn.com">foxconn.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Identifying risks through relevant business relationships</li> <li>• Not Met: Describe ongoing global risk identification in consultation with stakeholder/HR experts</li> <li>• Not Met: Triggered by new circumstances</li> <li>• Not Met: Describes risks identified</li> </ul>
B.2.2	Assessing human rights risks and impacts	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Describe process for assessment of HR risks and discloses salient HR issues: Although the Company indicates in its SER Report 2017 that it has Risk Assessment and Risk Management Systems, no further information found on a specific system to assess Human Rights Risks. [CSR Report 2019, 2019: <a href="http://foxconn.com">foxconn.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: How process applies to supply chain</li> <li>• Not Met: Public disclosure of the results of HR assessment</li> <li>• Not Met: Meets all requirements under score 1</li> <li>• Not Met: How it involved affected stakeholders in the assessment</li> </ul>
B.2.3	Integrating and acting on human rights risks and impact assessments	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Action Plans to mitigate risks</li> <li>• Not Met: Description of how global system applies to supply chain</li> <li>• Not Met: Example of actions decided on at least 1 salient HR issues</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Meets all requirements under score 1</li> <li>• Not Met: Involve stakeholders in decisions about actions</li> </ul>
B.2.4	Tracking the effectiveness of actions to respond to human rights risks and impacts	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: System for tracking or monitor if actions taken are effective</li> <li>• Not Met: Lessons learnt from checking system effectiveness</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Meets both requirements under score 1</li> <li>• Not Met: Involve stakeholders in evaluation of actions taken</li> </ul>
B.2.5	Communicating on human rights impacts	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Provides two examples of comms with stakeholders</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Describe challenges to effective comms and how it is working to address them</li> </ul>

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.1	Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Channel accessible to all workers: The company states: "In order to collect more employee feedback and suggestions, listen to employee voices, and quickly resolve employee difficulties, the Labor Union has integrated all resources to establish employee care, rights protection, and assistance hotlines, as well as office phone lines for various functional departments. Integration of labor union mailboxes, union chairman mailboxes, political party mailboxes, union chairman hotlines, rights protection hotlines, assistance hotlines, union websites, and 26 other rights protection mechanisms in 6 categories make it possible for Group employees, employee family members, and suppliers to get in contact with unions, providing employees with convenient and efficient 24-hour services that protect the rights of our employees at work and in their daily lives." [CSR Report 2020, 2021: <a href="http://foxconn.com">foxconn.com</a>] &amp; [CSR Report 2019, 2019: <a href="http://foxconn.com">foxconn.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Channel is available in all appropriate languages and workers aware</li> <li>• Met: Describe how workers in the supply chain have access to grievance mechanism: The company states: "Integration of labor union mailboxes, union chairman mailboxes, political party mailboxes, union chairman hotlines, rights protection hotlines, assistance hotlines, union websites, and 26 other rights protection mechanisms in 6 categories make it possible for Group employees, employee family members, and suppliers to get in contact with unions, providing employees with convenient and efficient 24-hour services that protect the rights of our employees at work and in their daily lives." [CSR Report 2020, 2021: <a href="http://foxconn.com">foxconn.com</a>]</li> <li>• Not Met: Expect Suppliers to convey expectation to their own suppliers</li> </ul>
C.2	Grievance channel(s)/mechanism(s) to receive complaints or concerns from external individuals and communities	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Grievance mechanism for community</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Describes accessibility and local languages and stakeholder awareness</li> <li>• Not Met: Communities access mechanism direct or through suppliers</li> <li>• Not Met: Expect supplier to convey expectation to their own suppliers</li> </ul>
C.3	Users are involved in the design and performance of the channel(s)/mechanism(s)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Engages users to create or assess system</li> <li>• Not Met: Examples (at least two) of how they do this</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Engages with potential or actual users on the improvement of the mechanism</li> <li>• Not Met: Provides user engagement example (at least two) on improvement</li> </ul>
C.4	Procedures related to the mechanism(s)/channel(s) are equitable, publicly available and explained	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Response timescales and how complainants will be informed: The company only states a few sample responses and results but does not provide any details on timescales and how complaints filed will be processed.</li> <li>• Not Met: Describe support (technical, financial, etc) available for equal access by complainants: As above.</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Describe types of outcome to complainant through use of mechanism</li> <li>• Not Met: Escalation to senior/independent level</li> </ul>
C.5	Prohibition of retaliation for raising complaints or concerns	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Public statement prohibiting retaliation: The Company states that: "Programs that ensure the confidentiality, anonymity and protection of supplier and employee whistleblowers are to be maintained, unless prohibited by law. Anonymous complaints with clear and specific descriptions of person/time/place/event are to be accepted and protected. Foxconn should have a communicated process for their personnel to be able to raise any concerns without fear of retaliation." No evidence found, however, of a commitment to non-retaliation, including external stakeholders. [Code of Conduct, 2021: <a href="http://honhai.com">honhai.com</a>]</li> <li>• Not Met: Practical measures to prevent retaliation</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Company indicate it will not retaliate against workers/stakeholders</li> <li>• Not Met: Expects suppliers to prohibit retaliation against workers/stakeholders: Company states that: "Suppliers are strictly prohibited from conducting any of the following zero-tolerance actions: Retaliation against employees who provide factual information." However, no clear commitment to this could be found. [CSR Report 2020, 2021: <a href="https://www.foxconn.com">foxconn.com</a>]</li> </ul>
C.6	Company involvement with state-based judicial and non-judicial grievance mechanisms	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Complainants not asked to waive rights</li> <li>• Not Met: Company does not require confidentiality provisions</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Will work with state based non judicial mechanisms</li> <li>• Not Met: Example of issue resolved (if applicable)</li> </ul>
C.7	Remedying adverse impacts	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Describes how remedy has been provided</li> <li>• Not Met: Says how it would provide remedy for victims if no adverse impact identified</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Changes to systems, processes and practices to stop similar impact</li> <li>• Not Met: Describe approach to monitoring implementation of agreed remedy</li> <li>• Not Met: Approach to learning from incident to prevent future impacts</li> </ul>
C.8	Communication on the effectiveness of grievance mechanism(s) and incorporating lessons learned	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Number grievances filed, addressed or resolved and outcome achieved</li> <li>• Not Met: How lessons from mechanism improve management system</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Evaluation of the channel/mechanism and changes made as result</li> <li>• Not Met: Describes procedures to address delays of outcomes agreed with stakeholders</li> </ul>

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.4.1.a	Living wage (in own production or manufacturing operations)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Pays living wage or sets target date: Company states that: "Our employees at overseas factories are all insured according to local government regulations. Starting salaries for entry-level employees at all our factories are 10-25% higher than local minimum wage requirements." However, there is no information provided of this being in line with the living wage at all of their locations. [CSR Report 2020, 2021: <a href="https://www.foxconn.com">foxconn.com</a>]</li> <li>• Not Met: Describes how living wage determined: As above. [CSR Report 2020, 2021: <a href="https://www.foxconn.com">foxconn.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Paying living wage</li> <li>• Not Met: Definition of living wage reviewed with unions</li> </ul>
D.4.1.b	Living wage (in the supply chain)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Discloses living wage requirements in supplier code or contracts: Company states that: "Compensation paid to workers shall comply with all applicable wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits. In compliance with local laws, workers shall be compensated for overtime at pay rates greater than regular hourly rates." However, this does not display a requirement to pay a living wage. [Foxconn Supplier Social and Environment Responsibility Code of Conduct, 31/03/2021: <a href="https://www.sser.foxconn.com">s-ser.foxconn.com</a>]</li> <li>• Not Met: Improving living wage practices of suppliers</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Assessment of number affected by payment below living wage</li> <li>• Not Met: Provides analysis of trends demonstrating progress</li> </ul>



Indicator Code	Indicator name	Score (out of 2)	Explanation
D.4.2	Aligning purchasing decisions with human rights	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Avoids business model pressure on HRs (purchasing practices)</li> <li>• Not Met: Practices adopted to pay suppliers in line with agreed timeframes</li> <li>• Not Met: Review own operations to mitigate negative impact</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Meets all requirements under score 1</li> <li>• Not Met: Examples of how it assessed, addressed and change purchasing practices</li> </ul>
D.4.3	Mapping and disclosing the supply chain	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Identifies direct and indirect suppliers back to manufacturing sites (factories or fields)</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Discloses names and locations of significant parts of SP and why</li> <li>• Not Met: Discloses which direct or indirect suppliers is involved in higher-risk activities</li> </ul>
D.4.4.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"> <li>• Met: Does not use child labour: Company states that "Child labor is not to be used in any stage of manufacturing. The term "child" refers to any person under the age of 15, or under the age for completing compulsory education, or under the minimum age for employment in the country, whichever is greatest." [Code of Conduct, 2021: <a href="http://honzhai.com">honzhai.com</a>]</li> <li>• Not Met: Age verification of workers recruited: Company says that "Foxconn shall implement an appropriate mechanism to verify the age of workers." However, the terminology indicates that this is an aspiration rather than an existing mechanism. [Code of Conduct, 2021: <a href="http://honzhai.com">honzhai.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Met: Remediation if children identified: Company says that "If child labor is identified, assistance or remediation is provided."</li> </ul>
D.4.4.b	Prohibition of child labour: Age verification and corrective actions (in the supply chain)	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Met: Child Labour rules in codes or contracts: The company indicates that its suppliers are bound to its Code of Conduct. The Code of Conduct states that "Child labor is not to be used in any stage of manufacturing. The term "child" refers to any person under the age of 15, or under the age for completing compulsory education, or under the minimum age for employment in the country, whichever is greatest. " [Code of Conduct, 2021: <a href="http://honzhai.com">honzhai.com</a>]</li> <li>• Not Met: How working with suppliers on child labour</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Assessment of number affected by child labour in supply chain</li> <li>• Not Met: Analysis of trends in progress made</li> </ul>
D.4.5.a	Prohibition of forced labour: Recruitment fees and costs (in own production or manufacturing operations)	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Met: Job seekers and workers do not pay recruitment fee: Company says that: "Workers shall not be required to pay employers' agents or sub-agents' recruitment fees or other related fees for their employment. " [Code of Conduct, 2021: <a href="http://honzhai.com">honzhai.com</a>]</li> <li>• Met: Commits to fully reimbursing if they have paid: The company states "If any such fees are found to have been paid by workers, such fees shall be repaid to the worker." [Code of Conduct, 2021: <a href="http://honzhai.com">honzhai.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: How practices are implemented and monitored for agencies, labour brokers or recruiters</li> </ul>
D.4.5.b	Prohibition of forced labour: Recruitment fees and costs (in the supply chain)	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Met: Debt and fees rules in codes or contracts: The Company requires its suppliers to comply with its Code of Conduct 'to the same level of standards which the supply-chain partners and industrial associations set for the ICT industry.' In its Code of Conduct, the Company indicates: 'Workers shall not be required to pay employers' or agents' recruitment fees or other related fees for their employment. If any such fees are found to have been paid by workers, such fees shall be repaid to the worker.[...] Deductions from wages as a disciplinary measure shall not be permitted.' [Code of Conduct, 2021: <a href="http://honzhai.com">honzhai.com</a>]</li> <li>• Not Met: How working with suppliers on debt &amp; fees</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			Score 2 <ul style="list-style-type: none"> <li>• Not Met: Assessment of the number affected by payment of recruitment fees</li> <li>• Not Met: Analysis of trends in progress made</li> </ul>
D.4.5.c	Prohibition of forced labour: Wage practices (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"> <li>• Not Met: Pays workers in full and on time</li> <li>• Met: Payslips show any legitimate deductions: The company states that: "For each pay period, workers shall be provided with a timely and understandable wage statement that includes sufficient information to verify accurate compensation for work performed." [Code of Conduct, 2021: <a href="http://honhai.com">honhai.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: How these practices are monitored for agencies, labour brokers or recruiters</li> </ul>
D.4.5.d	Prohibition of forced labour: Wage practices (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Requirement for suppliers to pay workers in full and on time in codes or contracts</li> <li>• Not Met: How working with supply chain to pay workers regularly and on time</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Assessment of the number affected by failure to pay directly</li> <li>• Not Met: Provides analysis of trends demonstrating progress</li> </ul>
D.4.5.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"> <li>• Not Met: Does not retain documents or restrict movement: Company says that: "There shall be no unreasonable restrictions on workers' freedom of movement in the facility in addition to unreasonable restrictions on entering or exiting company-provided facilities, including, if applicable, workers' dormitories or living quarters. [...] Employers, agents and sub-agents' may not hold or otherwise destroy, conceal, confiscate identity or immigration documents, such as government-issued identification, passports, or work permits" However, the company does not clarify its process for determining "reasonable restrictions of movement". [Code of Conduct, 2021: <a href="http://honhai.com">honhai.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: How these practices are monitored for agencies, labour brokers or recruiters: Company states that: "As part of the hiring process, workers must be provided with a written employment agreement in their native language that contains a description of terms and conditions of employment. Foreign migrant workers must receive the employment agreement prior to the worker departing from his or her country of origin and there shall be no substitution or change(s) allowed in the employment agreement upon arrival in the receiving country unless these changes are made to meet local law and provide equal or better terms." However, no description of how this is being monitored. [Code of Conduct, 2021: <a href="http://honhai.com">honhai.com</a>]</li> </ul>
D.4.5.f	Prohibition of forced labour: Restrictions on workers (in the supply chain)	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Met: Free movement rules in codes or contracts: The Company requires its suppliers to with its Code of Conduct 'to the same level of standards which the supply-chain partners and industrial associations set for the ICT industry.' In its Code of Conduct, the Company indicates: 'Forced, bonded (including debt bondage) or indentured labor, involuntary or exploitative prison labor, slavery or trafficking of persons shall not be used. [...] There shall be no unreasonable restrictions on workers' freedom of movement in the facility [...] All work must be voluntary and workers shall be free to leave work at any time or terminate their employment. Employers and agents may not hold or otherwise destroy, conceal, confiscate or deny access by employees to their identity or immigration documents, such as government-issued identification, passports or work permits, unless such holdings are required by law.' [Foxconn Supplier Social and Environment Responsibility Code of Conduct, 31/03/2021: <a href="http://sser.foxconn.com">sser.foxconn.com</a>]</li> <li>• Not Met: How working with suppliers on free movement</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Assessment of the number affected by retaining docs or restricting movement</li> <li>• Not Met: Provides analysis of trends demonstrating progress</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.4.6.a	Freedom of association and collective bargaining (in own production or manufacturing operations)	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Commits not to interfere with union rights / Steps to avoid intimidation or retaliation: Company says that: "In conformance with local law, Foxconn respects the right of all workers to form and join labor unions of their own choosing, to bargain collectively and to engage in peaceful assembly as well as respect the right of workers to refrain from such activities." However, the company does not disclose any alternatives it provides to workers in regions where the right to freedom of association and collective bargaining is restricted under the law. [Code of Conduct, 2021: <a href="http://hohai.com">hohai.com</a>]</li> <li>• Met: Discloses % total direct operations covered by collective CB agreements: Company says that: "In 2020, 98% of our employees were union members. The Labor Union signed the "Foxconn Technology Group Collective Agreement," which covers the 131 legal entities of the Group and provides basic protection of employee rights." [CSR Report 2020, 2021: <a href="http://foxconn.com">foxconn.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Meets both requirements under score 1</li> </ul>
D.4.6.b	Freedom of association and collective bargaining (in the supply chain)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: FoA &amp; CB rules in codes or contracts: The Company requires its suppliers to comply with its Code of Conduct 'to the same level of standards which the supply-chain partners and industrial associations set for the ICT industry.' In its Code of Conduct, the Company indicates: "In conformance with local law, participants shall respect the right of all workers to form and join trade unions of their own choosing, to bargain collectively, and to engage in peaceful assembly as well as respect the right of workers to refrain from such activities. Workers and/or their representatives shall be able to openly communicate and share ideas and concerns with management regarding working conditions and management practices without fear of discrimination, reprisal, intimidation, or harassment." However, no information was found on equivalent worker bodies where the right to freedom of association and collective bargaining is restricted under the law. [Foxconn Supplier Social and Environment Responsibility Code of Conduct, 31/03/2021: <a href="http://s-ser.foxconn.com">s-ser.foxconn.com</a>] &amp; [Code of Conduct, 2021: <a href="http://hohai.com">hohai.com</a>]</li> <li>• Not Met: How working with suppliers on FoA and CB</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Assessment of the number affected by restrictions to FoA and CB in the SP</li> <li>• Not Met: Provides analysis of trends demonstrating progress</li> </ul>
D.4.7.a	Health and safety: Fatalities, lost days, injury, occupational disease rates (in own production of manufacturing operations)	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Describes process to identify H&amp;S risks and impacts</li> <li>• Met: Injury Rate or Lost days or Near Miss disclosures for last reporting period: Company states that in 2020 were registered 0.0871 ratio of recorded occupational injury rate. [CSR Report 2020, 2021: <a href="http://foxconn.com">foxconn.com</a>]</li> <li>• Met: Discloses Fatalities for last reporting period: Company states that in 2020 were registered 2 fatal incidents caused by occupational injuries. [CSR Report 2020, 2021: <a href="http://foxconn.com">foxconn.com</a>]</li> <li>• Not Met: Occupational disease rate for last reporting period</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Set targets for H&amp;S performance: Company says that: "The Group sets "100% safety and zero hidden dangers" as its safety target. We have formulated the "Production Safety Incident Management System" to clearly stipulate the processes and responsibilities for incident reports, incident investigations, and investigative personnel levels." [CSR Report 2020, 2021: <a href="http://foxconn.com">foxconn.com</a>]</li> <li>• Not Met: Met targets or explain why not or what is doing to improve management systems</li> </ul>
D.4.7.b	Health and safety: Fatalities, lost days, injury, occupational disease rates (in the supply chain)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Sets out clear Health and Safety requirements</li> <li>• Not Met: Injury rate disclosures and lost days (or near miss disclosures) for the last reporting period</li> <li>• Not Met: Fatalities disclosures for lasting reporting period</li> <li>• Not Met: Occupational disease rates for the last reporting period</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: How working with suppliers on H&amp;S</li> <li>• Not Met: Assessment of the number affected by H&amp;S issues in the SP</li> <li>• Not Met: Provide analysis of trends in progress made</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.4.8.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"> <li>• Not Met: Process to stop harassment and violence against women</li> <li>• Not Met: Working conditions take account of gender</li> <li>• Not Met: Measures and steps to address gender pay gap at all levels of employment</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Meets all requirements under score 1</li> <li>• Not Met: Provides analysis of trends demonstrating closing gender pay gap</li> </ul>
D.4.8.b	Women's rights (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Women's rights in codes or contracts: Although the Code of conduct contains provisions on maternity and health, no evidence found of provisions found related to equal opportunities including remuneration. Suppliers are required to comply with code of conduct policy. [Code of Conduct, 2021: <a href="http://honhai.com">honhai.com</a>]</li> <li>• Not Met: How working with suppliers on women's rights</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Assessment on the number affected by discrimination or unsafe working conditions</li> <li>• Not Met: Provide analysis of trends in progress made</li> </ul>
D.4.9.a	Working hours (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"> <li>• Not Met: Respects max hours, min breaks and rest periods in its own operations</li> <li>• Not Met: Assesses ability to comply with its commitments when allocating work/targets</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Meets both requirements under score 1</li> <li>• Not Met: How it implements and checks this in its operations</li> </ul>
D.4.9.b	Working hours (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Working hours in codes or contracts: In its Code of Conduct, the Company indicates: 'Foxconn recognizes that unreasonable overtime for workers will result in reduced productivity, increased turnover, and increased injury and illness rates. Except in emergency under some unusual situations, a workweek shall be restricted to 60 hours including overtime, and workers shall be allowed at least one day off for every six days worked as stipulated in the RBA CoC.' Suppliers are required to comply with code of conduct policy. However, no evidence found of references to international standards, standard weekly hours. In addition, it not clear what 'exceptional or unusual situations' would be. [Code of Conduct, 2021: <a href="http://honhai.com">honhai.com</a>]</li> <li>• Not Met: How working with suppliers on working hours</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Assessment of number affected by excessive working hours</li> <li>• Not Met: Provide analysis of trends in progress made</li> </ul>
D.4.10.a	Responsible mineral sourcing: Arrangements with suppliers and smelters/refiners in the mineral resource supply chains	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Due diligence in accordance with OECD Guidance in supplier contracts</li> <li>• Not Met: Works with smelters/refiners and suppliers to build capacity</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Contractual requirement to disclosure smelter/refiner information</li> <li>• Not Met: Contractual requirement covers all minerals</li> </ul>
D.4.10.b	Responsible mineral sourcing: Risk identification and responses in mineral supply chain	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Risk identification and disclosure in line with OECD Guidance</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Not Met: Identification of smelter/refiners and OECD Guidance: 'The Group continues to collect due diligence reports on conflict minerals from suppliers through our Conflict Minerals Management System platform. We have adopted the Conflict Minerals Research Template (CMRT) developed by the RMI (Responsible Mineral Initiative). Over the past two years, a total of 4,836 surveys relating to supplier use of conflict minerals have been completed, achieving a supplier response rate of over 98%. In order to meet the requirements of customers for "conflict-free" products, the Group actively encourages upstream suppliers to use Conflict-Free Smelters (CFS). Suppliers using non-CFS smelters should encourage their smelters to gain certification or remove said smelters from their supply chains.' However, it is unclear if the Company assess whether smelters and refiners have carried out due diligence aligned with OECD Guidance. [CSR Report 2019, 2019: <a href="http://foxconn.com">foxconn.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Discloses smelters/refiners judged in line with OECD Guidance</li> <li>• Not Met: Risk identification and disclosure covers all minerals</li> </ul>
D.4.10.c	Reporting on responsible sourcing of minerals	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Describes mineral risk management plan for supply chain: The Company states: 'The Group requires suppliers to trace the origin of products potentially containing conflict minerals, including gold (Au), tantalum (Ta), tin (Sn), and tungsten (W), and to provide all relevant information regarding the sources of those minerals to our company. In addition, The Group's downstream suppliers are required to fulfil their due diligence on conflict-free minerals pursuant to the relevant international standards and regulations.' Additionally, it states that: 'over the past two years, a total of 4,836 relating to supplier use of conflict minerals have been completed.' However, no further details against the risk management process. [CSR Report 2019, 2019: <a href="http://foxconn.com">foxconn.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Monitoring, tracking and whether better risk prevention/mitigation over time</li> <li>• Not Met: Disclose better risk prevention/mitigation over time</li> <li>• Not Met: Suppliers and stakeholders engaged in risk management strategy</li> <li>• Not Met: Risk management and response processes cover all minerals</li> </ul>

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
E(1).0	Serious allegation No 1		<ul style="list-style-type: none"> <li>Area: Forced labour; discrimination</li> <li>Headline: Foxconn accused of using forced labour in China</li> <li>Story: On March 1st, 2020, the Australian Strategic Policy Institute (ASPI) released a report called "Uyghurs for sale" that named Foxconn among 83 companies benefiting from the use of potentially abusive labour transfer programmes. According to the report, more than 80,000 Uighur 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 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. In addition, the think tank said that the workers were allegedly transferred out of Xinjiang between 2017 and 2019 and claimed that people are being effectively "bought" and "sold" by local governments and commercial brokers.</li> </ul> <p>The ASPI used open-source public documents, satellite imagery, and media reports, allowing to identify 27 factories in nine Chinese provinces that have used labourers. The research found up to 560 Xinjiang workers were transferred to work several factories including to Foxconn Technology, that supplies brands such as Amazon, Apple, Dell, Google, Huawei and Microsoft. Other factory implicated is O-Film Technology which supplies Apple, Huawei, Lenovo and Samsung with camera and touchscreen components.</p> <p>ASPI researchers stated: "This report exposes a new phase in China's social re-engineering campaign targeting minority citizens, revealing new evidence that some factories across China are using forced Uighur labour under a state-sponsored labour transfer scheme that is tainting the global supply chain". The report calls on companies mentioned to "conduct immediate and thorough human rights due diligence on its factory labour in China, including robust and independent social audits and inspections."</p> <p>On August 2, 2021, Above Ground, a Canadian NGO released a report that finds Foxconn along with other companies are importing into Canada large quantities of goods from industries in which forced labor is known to be rife including products from specific manufacturers accused of using forced workers, for instance those operating in Xinjiang. According to the report, government document shows that Foxconn transferred 560 Xinjiang workers to factories in Henan, including Foxconn's Zhengzhou facility. The report calls for Canada to ensure vigorous and transparent enforcement of import controls and to adopt mandatory human rights due diligence legislation.</p> <p>[ABC, 01/03/2020, "Apple, Nike and other major companies implicated in Muslim forced labour in China": <a href="http://abc.net.au">abc.net.au</a>] [Australian Strategic Policy Institute, 01/03/2020, "Uyghurs for sale": <a href="http://aspi.org.au">aspi.org.au</a>] [The Guardian, 01/03/2020, "China transferred detained Uighurs to factories used by global brands – report": <a href="http://theguardian.com">theguardian.com</a>] [Business and Human Rights Resource Center, 02/08/2021, "Report finds high risk of slavery in Canadian supply chains, calls for stricter import controls and new due diligence law": <a href="http://business-humanrights.org">business-humanrights.org</a>]</p>
E(1).1	The company has responded publicly to the allegation	1	<p>The individual elements of the assessment are met or not as follows: Score 1</p> <ul style="list-style-type: none"> <li>Met: Public response: A Foxconn spokesperson told Above Ground reporters in March 2020 that "At no time has Foxconn ever had employees in its workforce in any operations who have not voluntarily joined our firm. Any allegations to the contrary are categorically false. All workers in Foxconn are recruited openly and compensated fairly.</li> </ul> <p>Foxconn is highly concerned on workers' rights and committed to in accordance with international regulations, local laws and industry standards and we don't tolerate the use of forced labor. In March 2020, Zhengzhou site of Foxconn, administration conducted a worker inventory, and the result showed that no group of Uyghur workers were recruited from Xinjiang area. We only had a few Uyghur workers in Zhengzhou site who have lived in Zhengzhou for decades. In May 2020, Zhengzhou facility received a third party audit (VAP) which was conducted by RBA (Responsible Business Alliance), and the NO. of VAP report was VAR-20200507-CN-13B02-1. The audit result showed that no findings of force labor issue happened in Zhengzhou site. Foxconn conducts internal audits, labor</p>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>audits, customer audits or third party audits every year to monitor compliance. As far, there is no force labor issues found in Foxconn sites".</p> <p>On 6 May 2021, the company responded to the observation of the Working Group on Business and Human Rights, stating that: "It is important to note that we have no operations in Xinjiang nor do we have any supply chain partners in that province. [...] None of the detailed audits of our operations has found evidence to indicate that there have been any human rights abuses associated with our company or any of our business partners. [...] Audits in China of company or supplier compliance with our Code of Conduct and those or individual customers are carried out regularly and, to date, those audits have found no evidence of forced labor or violations of worker rights in any aspect of our operations".</p> <p>[Above Gound, 06/2021, "CREATING CONSEQUENCES Canada's moment to act on slavery in global supply chains": <a href="https://aboveground.ngo">aboveground.ngo</a>] [Business and Human Rights Resource Center, 08/07/2021, "Response from Foxconn to "Creating Consequences" report": <a href="https://business-humanrights.org">business-humanrights.org</a>]</p> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Detailed response: In its response, the company addressed in detail the issue of the transfer of Xinjiang workers to Foxconn's Zhengzhou facility, but it did not mention the transfer to other factories in Henan. Furthermore, it did not engage with the aspect of alleged discrimination of Uyghurs.</li> </ul>
E(1).2	The company has investigated and taken appropriate action	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Engaged with stakeholders</li> <li>• Not Met: Identified cause</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Identified and implemented improvements</li> <li>• Not Met: Stakeholder input to steps taken</li> </ul>
E(1).3	The company has engaged with affected stakeholders to provide for or cooperate in remedy(ies)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Provided remedy</li> <li>• Not Met: Evidence for lack of Impact or link: The Company declared that "In March 2020, Zhengzhou site of Foxconn, administration conducted a worker inventory, and the result showed that no group of Uyghur workers were recruited from Xinjiang area. We only had a few Uyghur workers in Zhengzhou site who have lived in Zhengzhou for decades. In May 2020, Zhengzhou facility received a third party audit (VAP) which was conducted by RBA (Responsible Business Alliance), and the NO. of VAP report was VAR-20200507-CN-13B02-1. The audit result showed that no findings of force labor issue happened in Zhengzhou site. Foxconn conducts internal audits, labor audits, customer audits or third party audits every year to monitor compliance. As far, there is no force labor issues found in Foxconn sites". However, the company does not provide detailed evidence of its claims. Furthermore, it refers only to the Zhengzhou site and does not mention specific audits of other factories in Henan. <p>[Business and Human Rights Resource Center, 08/07/2021: <a href="https://business-humanrights.org">business-humanrights.org</a>]</p> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Remedy satisfactory to stakeholders</li> <li>• Not Met: Remedy delivered</li> <li>• Not Met: Independent remedy process used</li> </ul> </li></ul>
E(2).0	Serious allegation No 2		<ul style="list-style-type: none"> <li>• Area: Working hours; child labour</li> <li>• Headline: Foxconn accused by China Labour Watch of non-respect of working conditions</li> <li>• Story: On 10 June, 2018, China Labor Watch (CLW) published the report of investigation it conducted at Hengyang Foxconn, a unit of Hon Hai Precision Industry Co., Ltd. (Foxconn). The factory manufactures Amazon's Kindle, Echo Dots and tablets. The report detailed issues of working conditions at the factory between August 2007 and April 2018. The issues identified in the report include excessive working hours (over 100 hours of overtime per month at peak production season) exceeding the legal overtime limit in China. In addition, it was claimed that some workers worked 14 days in a row with no days off.</li> </ul> <p>On August 8, 2019, China Labor Watch published a follow-up investigation report to its 2018 investigation at Hengyang Foxconn. The current investigation found that working conditions have deteriorated.</p>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Press sources reported in July, 2021, that the Foxconn manager who had raised alarms about labour code violations at the factory was incarcerated. According to CLW, Foxconn's revenge violated the third section 'Grievance Mechanism and Whistle-blower Protections' of the Amazon Supply Chain Standards of Ethical Behaviour.</p> <p>[China Labor Watch, 08/08/2019, "Amazon's Supplier Factory Foxconn Recruits Illegally: Interns Forced to Work Overtime": <a href="http://chinalaborwatch.org">chinalaborwatch.org</a>] [The Guardian, 08/08/2019, "Schoolchildren in China work overnight to produce Amazon Alexa devices": <a href="http://theguardian.com">theguardian.com</a>] [China Labor Watch, 22/07/2021, "FORCED LABOR WHISTLEBLOWER WAS SENT TO PRISON BY AMAZON SUPPLY CHAIN FOXCONN": <a href="http://chinalaborwatch.org">chinalaborwatch.org</a>]</p>
E(2).1	The Company has responded publicly to the allegation	1	<p>The individual elements of the assessment are met or not as follows: Score 1</p> <ul style="list-style-type: none"> <li>• Met: Public response: In a statement emailed to Reuters in June 2018, Foxconn said: "We are carrying out a full investigation of the areas raised by that report, and if found to be true, immediate actions will be taken to bring the operations into compliance with our Code of Conduct."</li> </ul> <p>The company said in a statement: "We have doubled the oversight and monitoring of the internship program with each relevant partner school to ensure that, under no circumstances, will interns [be] allowed to work overtime or nights. "There have been instances in the past where lax oversight on the part of the local management team has allowed this to happen and, while the impacted interns were paid the additional wages associated with these shifts, this is not acceptable and we have taken immediate steps to ensure it will not be repeated." [Venture Beat, 11/06/2018, "U.S. watchdog slams working conditions at Chinese Foxconn plant that makes Amazon devices": <a href="http://venturebeat.com">venturebeat.com</a>]</p> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Detailed response: The company never addressed the allegation regarding Tang Mingfang's unlawful jailing.</li> </ul>
E(2).2	The Company has appropriate policies in place	0.5	<p>The individual elements of the assessment are met or not as follows: Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Engaged with stakeholders</li> <li>• Not Met: Identified cause: The company does not present investigative results on the underlying causes of the events concerned. They did identify shortcomings but they did not address the reasons underlying the decisions leading to children overwork.</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Identified and implemented improvements: Foxconn said that it would increase the number of regular workers and review salaries immediately and that it fired two executives at the site in Hengyang after CLW investigation. Amazon required Foxconn to improve workers' working and living conditions, to increase workers' wages by RMB 1,407,039, and to dismiss the supervisor of the factory as well as the human resources manager. [Aljazeera, 09/09/2019, "Apple, Foxconn admit breaking Chinese labour law at iPhone plant": <a href="http://aljazeera.com">aljazeera.com</a>] [BBC, 09/08/2019, "Amazon Echo devices made by Chinese teens 'working through night' - reports": <a href="http://bbc.com">bbc.com</a>]</li> <li>• Not Met: Stakeholder input to steps taken: There is no evidence suggesting that the views of affected stakeholders were taken into account in the improvement of the company policies.</li> </ul>
E(2).3	The Company has taken appropriate action	1	<p>The individual elements of the assessment are met or not as follows: Score 1</p> <ul style="list-style-type: none"> <li>• Met: Provided remedy: Foxconn paid more than £165,000 in compensation for underpaying workers making Echo and Echo Dot devices in Hengyang. [The Guardian, 30/01/2022, "Alexa whistleblower demands Amazon apology after being jailed and tortured": <a href="http://theguardian.com">theguardian.com</a>]</li> <li>• Not Met: Evidence for lack of impact or link</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Remedy satisfactory to stakeholders: Foxconn paid more than £165,000 in compensation for underpaying workers making Echo and Echo Dot devices in Hengyang. However, there is no evidence that the company provided remedy to the interns for their overwork and to Tang Mingfang for his unlawful jailing.</li> <li>• Not Met: Remedy delivered: Foxconn paid more than £165,000 in compensation for underpaying workers making Echo and Echo Dot devices in Hengyang. However, there is no evidence that the company provided remedy to the interns for their overwork and to Tang Mingfang for his unlawful jailing.</li> </ul>



Indicator Code	Indicator name	Score (out of 2)	Explanation
E(3).0	Serious allegation No 3		<ul style="list-style-type: none"> <li>• Not Met: Independent remedy process used</li> <li>• Area: Working hours</li> <li>• <b>Headline:</b> Foxconn and Apple accused of breaching Chinese labour laws when relying on temporary workers to produce iPhones</li> <li>• <b>Story:</b> On September 8, 2019, China Labour Watch (CLW) published a report accusing Apple and its partner Foxconn of breaching numerous Chinese labour laws at the Zhengzhou Foxconn factory. The report is based on a CLW undercover investigation.</li> </ul> <p>CLW named several violations including:</p> <ul style="list-style-type: none"> <li>- During peak season, regular workers' resignations will not be approved.</li> <li>- Some dispatch workers failed to receive their promised bonuses from the dispatch company.</li> <li>- The factory does not pay social insurance for the dispatched workers.</li> <li>- During peak production season, student workers must work overtime. However, according to regulations on student internships, students are not to work overtime or night shifts.</li> <li>- Chinese labour law mandates that workers must not work more than 36 overtime hours a month. However, during the peak production seasons, workers at Zhengzhou Foxconn put in at least 100 overtime hours a month.</li> <li>- If workers do not receive approval and choose not to work overtime, they will be admonished by the line manager and will not be working overtime in the future.</li> <li>- If work is not completed by the time the shift ends, workers must work overtime and workers are not paid for this.</li> <li>- Workers sometimes have to stay back for night meetings at work, and this time is unpaid.</li> <li>- The factory does not provide workers with adequate personal protective equipment and workers do not receive any occupational health and safety training.</li> <li>- The factory does not provide a single training class on fire safety and other relevant knowledge.</li> <li>- The chairman of the labour union is always appointed by the factory, not elected by the workers, and the chairman is always the department leader or manager.</li> <li>- Verbal abuse is common at the factory.</li> <li>- The factory violates the "The Administrative Provisions on the Internships of Vocational School Students" which stipulates that student workers cannot be recruited by agencies or dispatch companies but only schools.</li> </ul> <p>[CNET, 09/09/2019, "Apple, Foxconn acknowledge relying on temporary workers in China too much": <a href="http://cnet.com">cnet.com</a>] [China Labor Watch, 08/09/2019, "iPhone 11 Illegally Produced in China: Apple Allows Supplier Factory Foxconn to Violate Labor Laws": <a href="http://chinalaborwatch.org">chinalaborwatch.org</a>] [CNN, 09/09/2019, "Apple says a supplier's factory in China violated labor rules": <a href="http://edition.cnn.com">edition.cnn.com</a>] [The Verge, 09/12/2020, "Former employees say Apple stood by while suppliers violated Chinese labor laws": <a href="http://theverge.com">theverge.com</a>]</p>
E(3).1	The Company has responded publicly to the allegation	1	<p>The individual elements of the assessment are met or not as follows: Score 1</p> <ul style="list-style-type: none"> <li>• <b>Met:</b> Public response: In September 2019, Foxconn told CNBC in a statement: "Foxconn employs a workforce in its operations in China that is comprised of a combination of full-time employees and dispatch workers. In addition, in some locations, we have an established, short-term internship program that we carry out in cooperation with local governments and vocational schools. In all cases and with all types of workers, we offer an industry-competitive salary and related benefits that significantly exceeds government-mandated levels. We work hard to comply with all relevant laws and regulations across all our operations. We can confirm that a recent review of our operations at our facility in Zhengzhou did identify some workforce compliance issues. As soon as we received the results of that review, we immediately began a detailed process to ensure that all issues were addressed. At no time did we find any evidence of forced labor and we can confirm that this facility currently has no interns working overtime. We did find evidence that the use of dispatch workers and the number of hours of overtime work carried out by employees, which we have confirmed was always voluntary, was not consistent with company guidelines. We did determine that the affected workers were paid all earned overtime and related bonus payments.</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			Our work to address the issues identified in our Zhengzhou facility continues and we will closely monitor the situation. We will not hesitate to take any additional steps that might be required to meet the high standards we set for our operations." Foxconn admitted that students had been employed illegally and said it was taking immediate action to fix the situation. [CNBC, 09/09/2019, "Apple denies claims it broke Chinese labor laws in iPhone factory": <a href="https://www.cnbc.com">cnbc.com</a> ] Score 2 • Not Met: Detailed response: The company responded in very general terms and did not address the allegation in detail.
E(3).2	The Company has appropriate policies in place	0	The individual elements of the assessment are met or not as follows: Score 1 • Not Met: Engaged with stakeholders • Not Met: Identified cause Score 2 • Not Met: Identified and implemented improvements: Foxconn declared that the issue of students workers voluntary working overtime or night shift has been corrected. However, there is no evidence that the company made changes to its policies following the events and their human rights impacts. [China Labor Watch, 09/08/2018, "APPLE, FOXCONN BROKE A CHINESE LABOR LAW TO BUILD LATEST IPHONES": <a href="https://chinalaborwatch.org">chinalaborwatch.org</a> ] • Not Met: Stakeholder input to steps taken
E(3).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 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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