

Company Name Geely
Industry Automotive (Own Operations and Supply Chain)
Overall Score 6.5 out of 100

Theme Score	Out of	For Theme
0.2	10	A. Governance and Policies
1.1	25	B. Embedding Respect and Human Rights Due Diligence
3.5	20	C. Remedies and Grievance Mechanisms
1.7	25	D. Performance: Company Human Rights Practices
0.0	20	E. Performance: Responses to Serious Allegations

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

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

Detailed assessment

A. Governance and Policies (10% of Total)

A.1 Policy Commitments (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1.1	Commitment to respect human rights	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 Company indicates, in its Code of Business Conduct, that: 'Geely undertakes to comply with internationally accepted human rights'. However, 'undertakes to comply' is not considered a formal statement of commitment according to CHRB wording criteria. [Code of Business Conduct, 18/03/2022: geelyauto.com.hk] 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: The 2018 CSR Report states that 'We have signed seven collective agreements with our employees, such as Labour Contract, Special Wage Collective Contract and Agreement on Protection of Rights and Interests of Female Workers, to protect their fundamental rights'. Moreover, in the 2019 report, it explains that 'Geely seeks to create an equal, fair and harmonious work environment for every employee. We have adopted methods that are suited to the local circumstances to establish cross-cultural communication and integration, and consolidated global talents of different histories and cultural backgrounds'. However, no publicly available statement found in a suitable policy document committing it to respect the human rights that the ILO has declared to be fundamental rights at work. [2019 CSR Report, 04/2020: geelyauto.com.hk]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not Met: Company has a explicit commitment to All four ILO Core: In its Code of Business Conduct, the Company discloses its human rights commitments: Prohibition of discrimination; Prohibition of child labor and forced labor. However, no evidence found that the Company commits to the right to freedom of association and the right to collective bargaining. [Code of Business Conduct, 18/03/2022: geelyauto.com.hk] <p>Score 2</p> <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 sets out its expectations of working conditions and human rights in its Supplier Code of Conduct. That includes: 'Suppliers shall not use any form of force labor. (...) Suppliers shall not use child labor in any form. (...) Supplier shall not engage in any form of discrimination against any employee based on gender, race, religion, age, marital status, maternity status, disability, sexual orientation, nationality, political opinion, union affiliation, social background, and any other characteristics protected by applicable laws. All employees should be treated with equal respect'. However, it is not clear that it expects suppliers to respect the right to freedom of association and the right to collective bargaining. [Supplier Code of Conduct, 2021: geelyauto.com.hk]
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"> • Not Met: Commitment to respect H&S of workers: The Company indicates, in its Code of Business Conduct, that: 'Geely undertakes to provide all employees with all necessary safeguards in compliance with occupational health and safety standards as well as minimize health and safety risks and impacts by continuously improving the working conditions and implementing various risk prevention and health promotion measures'. However, 'undertakes to... comply...minimize' is not considered a formal statement of commitment according to CHRB wording criteria. [Code of Business Conduct, 18/03/2022: geelyauto.com.hk] • Not Met: Respect ILO labour standards on working hours or Commits to 48 hours regular work week <p>Score 2</p> <ul style="list-style-type: none"> • Met: Expect suppliers to commit to H&S of their workers: The Supplier Code of Conduct indicates: 'Suppliers shall comply with all applicable health and safety laws and regulations. (...) Suppliers shall take effective measures to prevent accidents and formulate emergency plans. Suppliers shall also provide guidance to employees to reduce health and safety risks and impacts'. [Supplier Code of Conduct, 2021: geelyauto.com.hk] • Not Met: Expect suppliers to commit to ILO labour standard or to 48 hours regular work week: The Supplier Code of Conduct indicates: 'Suppliers shall comply with applicable laws regarding working hours, including but not limited to overtime and overtime compensation'. However, it is not clear the Company expects suppliers to commit to respecting the ILO conventions on working hours. Alternatively, the Company would achieve this by expecting a commitment to a 48 hours regular working week, and consensual overtime paid at a premium rate. [Supplier Code of Conduct, 2021: geelyauto.com.hk]
A.1.3.a.MO	Commitment to respect human rights particularly relevant to the industry – responsible sourcing of minerals (MO)	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"> • Not Met: Responsible mineral sourcing • Not Met: Based on OECD Guidance • Not Met: Requires suppliers to commit to responsible mineral sourcing: The Supplier Code of Conduct indicates: 'Suppliers shall exercise due diligence in their supply chain to ensure that the extraction or trade of minerals or metals contained in the products supplied to Geely does not infringe on human rights, violate business ethics, or harm the environment, and the proceeds from sales shall not be used to fund armed conflicts'. However, it is not clear the Company requires its suppliers to follow the OECD Guidance. [Supplier Code of Conduct, 2021: geelyauto.com.hk] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Commits to follow OECD Guidance for all minerals • Not Met: Suppliers expected to make similar requirements of their suppliers
A.1.3.b.MO	Commitment to respect human rights particularly relevant to the industry –	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"> • Not Met: Women's rights • Not Met: Children's rights • Not Met: Migrant worker's rights • Not Met: Expects suppliers to respect these rights

Indicator Code	Indicator name	Score (out of 2)	Explanation
	vulnerable groups (MO)		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
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): The Company indicates that 'Persons making appropriate complaints in accordance with this policy are assured of protection against unfair dismissal, victimisation or unwarranted disciplinary action, even if the suspected concerns are confirmed to be unsubstantiated after formal internal investigation. Persons who victimise or retaliate against those who have raised concerns under this policy will be subject to disciplinary and/or legal actions'. However, no evidence found of publicly available statement committing to neither tolerate nor contribute to threats against human rights defenders in relation to its operations. [Whistleblowing Policy, 29/12/2017: geelyauto.com.hk] Score 2 <ul style="list-style-type: none"> • Not Met: Company expect suppliers to make this commitment • 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 2020 CRS Report indicates: 'the Board of Directors established the Sustainability Committee in December 2020 which further enhanced the Environmental, Social, and Governance (ESG)'s governance structure'. The 2021 Annual Report notes: 'the Board of Directors established the Sustainability Committee in December 2020 which further enhanced the Environmental, Social, and Governance (ESG)'s governance structure'. However, it is not clear a board member or board committee is tasked with specific governance oversight of respect for human rights. No further evidence found. [2020 CSR Report, 2021: geelyauto.com.hk] & [2021 Annual Report, 2021: geelyauto.com.hk] 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: It indicates: 'During the year, the Sustainability Committee held 4 meetings. The committee reviewed the ESG Report 2020; engaged an external consultant for the upcoming ESG Report 2021; and reviewed the terms of reference of the committee'. However, it is not clear the processes it has in place to discuss and regularly review its human rights strategy or policy or management processes at board level or a board committee. [2021 Annual Report, 2021: geelyauto.com.hk] Score 2 <ul style="list-style-type: none"> • Not Met: Examples/trends re HR discussion in the last reporting period • 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

Indicator Code	Indicator name	Score (out of 2)	Explanation
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 • Not Met: Describe frequency and triggers for reviewing Score 2 <ul style="list-style-type: none"> • 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	0.5	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: See indicator A.1.2. • Met: Senior responsibility for HR implementation and decision making: The 2021 Annual Report notes: ‘the Board of Directors established the Sustainability Committee in December 2020 which further enhanced the Environmental, Social, and Governance (ESG)’s governance structure’. The Company indicates that ESG evaluation criteria includes labour issues. [2021 Annual Report, 2021: geelyauto.com.hk] Score 2 <ul style="list-style-type: none"> • Met: How it assigns Day-to-day responsibility: It indicates: ‘The ESG governance structure consists of the Board of Directors, the Sustainability Committee, ESG working group and supervisory department, and ESG related departments, and we integrated ESG management into various aspects of our operations’. The Company indicates that ESG evaluation criteria includes labour issues. [2020 CSR Report, 2021: geelyauto.com.hk] • Not Met: Day-to-day resources and expertise allocation in own ops • Not Met: Resources and expertise allocation in the supply chain
B.1.2	Incentives and performance management	0	The individual elements of the assessment are met or not as follows: Score 1 <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 • 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: See indicator A.1.2. • Not Met: Communicates its policy to all workers in own operations: It indicates: ‘To protect the rights & interests of employees and build a good labour relation, we set policies on working hours, holiday arrangements, recruitment, and dismissal such as the “Benefits Management Policy”, the “Employee Onboarding & Personnel Change Management Policy”, and the “Recruitment Management Policy”. (...) At the same time, we strictly enforce national laws & regulations on child labour & forced labour’. However, it is not clear how it communicates its policy commitment to all its workers, including in local languages where necessary. [2020 CSR Report, 2021: geelyauto.com.hk] Score 2 <ul style="list-style-type: none"> • Not Met: Communication of policy commitments to stakeholder • Not Met: How policy commitments are made accessible to audience
B.1.4.b	Communication /dissemination of policy commitment(s) to business relationships	0.5	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: See indicator A.1.2. • Not Met: Steps to communicate policy commitments to supply chain Score 2 <ul style="list-style-type: none"> • Met: Requires suppliers to communicate policy requirements: The Supplier Code of Conduct indicates: ‘This Code shall be deemed an integral part of any agreement between the Supplier and Geely. During their business relationship with Geely, suppliers shall comply with applicable laws and regulations as well as the principles set out in the Code. When choosing their own suppliers, suppliers shall conduct

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>appropriate due diligence and require such sub suppliers to also comply with the principles set out in the Code'. [Supplier Code of Conduct, 2021: geelyauto.com.hk]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Met: How HR commitments made binding/contractual: The Supplier Code of Conduct indicates: 'This Code shall be deemed an integral part of any agreement between the Supplier and Geely. During their business relationship with Geely, suppliers shall comply with applicable laws and regulations as well as the principles set out in the Code'. [Supplier Code of Conduct, 2021: geelyauto.com.hk] • Not Met: Company requires suppliers to cascade down to their suppliers
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"> • Not Met: Scores at least 1 on A.1.2.a: See indicator A.1.2. • Not Met: How workers are trained on HR policy commitments: The Code of Conduct indicates: 'In order to raise compliance awareness among all staff, Geely has established and continues to run a clearly structured compliance training system covering all staff and provides resources to ensure that compliance training is carried out in an orderly manner to ensure its relevance and effectiveness'. The Code of Conduct contains the Company's human rights commitments. However, no further description of the human rights training found. Current evidence comes from a policy document, and therefore it is not clear whether training is actually being conducted. [Code of Business Conduct, 18/03/2022: geelyauto.com.hk] • Not Met: Trains relevant managers including procurement <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Score of 2 on A.1.2.a: See indicator A.1.2. • Not Met: Meets both requirements under score 1 • Not Met: Trains suppliers to meet company's HR commitment: Regarding its ESG risk management, it indicates: 'we conducted trainings on related topics for our large suppliers, to promote continuous improvement and were well-received by our suppliers, especially those in China. This energized the future sustainable development in the automobile industry'. Although the Company describes some specific trainings for suppliers, no evidence found of general human rights training (policy commitments) conducted for suppliers. [2020 CSR Report, 2021: geelyauto.com.hk] • Not Met: Disclose % trained
B.1.6	Monitoring and corrective actions	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Scores at least 1 on A.1.2.a: See indicator A.1.2. • Not Met: Monitoring implementation of HR policy commitments across global ops and supply chain: Regarding its supply chain compliance monitoring, it indicates: 'We conduct routine audits & unannounced audits for suppliers to ensure their compliance with our requirements and their management of ESG risks to achieve for a responsible and sustainable supply chain. (...) Routine audits include new supplier accreditation audits, 3A routine audits, etc. which evaluate the suppliers' overall capabilities'. ESG evaluation criteria in supplier audit include: 'No child labor and no personnel engaged in work harmful to health; Comply with national labour law; OHSAS 18000 certification on occupational health and safety; A well-defined remuneration and benefits policies; A trade union which regularly conducts employee satisfaction survey'. However, it is not clear how the Company monitors the implementation of its human rights policy commitments across its global operations. [2020 CSR Report, 2021: geelyauto.com.hk] • Met: Proportion of supply chain monitored: It indicates: 'During the Reporting Period, we conducted routine audits & unannounced audits on 65% of suppliers'. [2020 CSR Report, 2021: geelyauto.com.hk] • Not Met: Describe how workers are involved in monitoring <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Score of 2 on A.1.2.a: See indicator A.1.2. • Not Met: Describes corrective action process • Not Met: Disclose findings and number of corrective action
B.1.7	Engaging and terminating 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"> • Met: HR affects selection of suppliers: The Company states that: 'We carry out supplier risk assessments and accreditation reviews when sourcing from new suppliers. These are done to identify quality, technical and operational (including ESG) risks in early stage, to get prepared with supplier accreditation in advance. Potential supplier's accreditation is required to be reviewed on-site by R&D, SQE, and Purchasing teams jointly, and only qualified suppliers can then be included in the supplier system. Purchasing team is responsible for the evaluation of suppliers' operational management capabilities (including, but not limited to, (...)

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			<p>occupational health and safety in production, labor rights, employee care), so as to select the best suppliers in alignment with the Group's sustainability goals'. [2020 CSR Report, 2021: geelyauto.com.hk]</p> <ul style="list-style-type: none"> • Not Met: HR affects on-going supplier relationships: Regarding supplier performance reviews, the 2018 CSR Report states that 'We divided the evaluation results into four grades, A, B, C, and D, sorting from the best to the worst, and formulated the corresponding reward and punishment measures. According to the annual assessment of suppliers, we introduce excellent suppliers every year and eliminate the worst 20 suppliers. In 2018, the proportion of grade A and B suppliers increased from 75% in 2017 to 90%'. Moreover, in its 2019 CSR Report, it states that 'For strategic suppliers ranked at the top of the "pyramid", we give more resource support and privileges, such as quota allocation and new project development; for suppliers with insufficient capabilities, we set up a quality management college to carry out customised training projects; the suppliers that we phase out are companies with low coordination, worsening quality problems and integrity, and compliance problems'. However, it is not clear how human rights performance is taken into account in how this performance affects relationship. No further evidence found in the latest review. Evidence doesn't refer explicitly to human rights related topics, as indicated below, it refers to quality, cost, delivery and technology'. [2018 Social Responsibility Report, 06/2019: geelyauto.com.hk] & [2019 CSR Report, 04/2020: geelyauto.com.hk] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describe positive incentives offered to respect human rights: The Company indicates in its 2018 CSR Report, that 'Geely conducts supplier performance reviews quarterly from the four aspects of supplier quality, cost, delivery and technology. We divided the evaluation results into four grades, A, B, C, and D, sorting from the best to the worst, and formulated the corresponding reward and punishment measures'. Moreover, in its 2019 CSR Report, it states that 'For strategic suppliers ranked at the top of the "pyramid", we give more resource support and privileges, such as quota allocation and new project development; for suppliers with insufficient capabilities'. However, it is not clear the Company has specific positive incentives it puts into place via its purchasing practices to encourage its business relationships to act with respect for human rights. No further evidence found in the latest review. Evidence doesn't refer explicitly to human rights related topics. As indicated below, it refers to quality, cost, delivery and technology'. [2018 Social Responsibility Report, 06/2019: geelyauto.com.hk] & [2019 CSR Report, 04/2020: geelyauto.com.hk] • Not Met: Working with suppliers to meet HR requirements: It states that 'Through measures such as supplier trainings, technology annual meetings, and in-situ follow-up guidance from Geely's engineers, Geely has comprehensively improved the compliance and innovation capabilities of its suppliers'. However, it is not clear how it works with business relationships to improve human rights performance. [2019 CSR Report, 04/2020: geelyauto.com.hk]
B.1.8	Approach to engagement with affected 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"> • Not Met: Stakeholder process or systems to identify and engage with workers/communities in the last two years: The Company discloses a list of stakeholders with concerned issues, communication and feedback channels and communication frequency for each different group. The Company's stakeholders include: employees, suppliers and communities. However, it is not clear how it has identified, and engaged with affected stakeholders in the last two years. The explanation should include workers or local communities in its supply chain. [2020 CSR Report, 2021: geelyauto.com.hk] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Discloses stakeholders that HRs may be affected • Not Met: Provides two examples of engagement with stakeholders • 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	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Identifying risks in own operations

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not Met: Identifying risks through relevant business relationships: It indicates: 'For ESG risks, we have identified and screened the supply chain ESG risks during accreditation and evaluation to reduce the risk exposure. For ESG risk responses, we adopted Sedex SAQ1, Dun & Bradstreet2, Dow Jones index3, etc. to evaluate the ESG performance of suppliers for analysis and management'. Also, 'In order to address the supply chain risks, we performed analysis on supply chain risks, and formulated early warning mechanism and response measures for risks in (...) and ESG'. However, no explanation found of how it identifies its human rights risks and impacts in specific locations or activities within its supply chain. Current evidence seems to refer to evaluate individual supplier risk and take corrective measures. This datapoint looks for evidence of how the Company identifies which are the potential human rights risks and impacts that it faces in its supply chain. [2020 CSR Report, 2021: geelyauto.com.hk] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describe ongoing global risk identification in consultation with stakeholder/HR experts: See above. No evidence found of a global system in place to identify its human rights risks and impacts on a regular basis across its activities, including in its own operations, involving consultation with affected stakeholders and human rights experts. [2020 CSR Report, 2021: geelyauto.com.hk] • Not Met: Triggered by new circumstances • Not Met: Describes risks identified
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"> • Not Met: Describe process for assessment of HR risks and discloses salient HR issues • Not Met: How process applies to supply chain: In relation to supply chain, the Company indicates that 'For ESG risks, we have identified and screened the supply chain ESG risks during accreditation and evaluation to reduce the risk exposure. For ESG risk responses, we adopted Sedex SAQ1, Dun & Bradstreet2, Dow Jones index3, etc. to evaluate the ESG performance of suppliers for analysis and management'. Also, 'In order to address the supply chain risks, we performed analysis on supply chain risks, and formulated early warning mechanism and response measures for risks in (...) and ESG. (...) More attention was paid on suppliers with higher risks in quality and delivery'. However, no further description found of its process for assessing its human rights risks, including how geographical, social, economic or other factors are taken into account. [2020 CSR Report, 2021: geelyauto.com.hk] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Public disclosure of the results of HR assessment
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"> • Not Met: Action Plans to mitigate risks • Not Met: Description of how global system applies to supply chain: Regarding its supply chain risk responses, it indicates: 'We have also carried out corresponding risk prevention and control measures in supply chain's life cycle'. However, no further description found of its global system to prevent, mitigate or remediate its salient human rights issues. [2020 CSR Report, 2021: geelyauto.com.hk] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Example of actions decided on at least 1 salient HR issues
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"> • Not Met: System for tracking or monitor if actions taken are effective • Not Met: Lessons learnt from checking system effectiveness <p>Score 2</p> <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	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Provides two examples of comms with stakeholders <p>Score 2</p> <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	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Channel accessible to all workers: The whistleblowing policy states that 'Geely Automobile Holdings Limited (...) and its subsidiaries (...) are committed to the highest possible standards of openness, probity and accountability. In line with this commitment, this policy aims to provide an avenue for employees, suppliers, customers, etc., who deal with the Group (...) to raise any suspected misconduct or malpractice within the Group (the "Whistleblower"). It then has disclosed 2 reporting channels: mail and email. [Whistleblowing Policy, 29/12/2017: geelyauto.com.hk] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Channel is available in all appropriate languages and workers aware • Met: Describe how workers in the supply chain have access to grievance mechanism: The Supplier Code of Conduct indicates: 'To raise any question about the Code or report any possible violation, please contact Geely at coc@geely.com'. [Supplier Code of Conduct, 2021: geelyauto.com.hk] • Not Met: Expect Suppliers to convey expectation to their own suppliers
C.2	Grievance channel(s)/mechanism(s) to receive complaints or concerns from external individuals and communities	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"> • Met: Grievance mechanism for community: The whistleblowing policy states that 'Geely Automobile Holdings Limited (...) and its subsidiaries (...) are committed to the highest possible standards of openness, probity and accountability. In line with this commitment, this policy aims to provide an avenue for employees, suppliers, customers, etc., who deal with the Group (...) to raise any suspected misconduct or malpractice within the Group (the "Whistleblower"). It then has disclosed 2 reporting channels: mail and email. The policy applies to all group employees 'and other related stakeholders'. [Whistleblowing Policy, 29/12/2017: geelyauto.com.hk] <p>Score 2</p> <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: The Supplier Code of Conduct indicates: 'To raise any question about the Code or report any possible violation, please contact Geely at coc@geely.com'. However, it is not clear that external individuals and communities have access to it) to raise Complaints or concerns about human rights issues at the company's suppliers. [Supplier Code of Conduct, 2021: geelyauto.com.hk] • 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	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <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 <p>Score 2</p> <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	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Response timescales and how complainants will be informed: It indicates: 'You will receive in writing the outcome of the investigation. Because of legal constraints, we will not be able to give you details of the action taken or a copy of the report. Subject to the nature and complexity of the matter, we expect to complete the investigation and provide you with the outcome in 3 months'. [Whistleblowing Policy, 29/12/2017: geelyauto.com.hk] • Not Met: Describe support (technical, financial, etc) available for equal access by complainants <p>Score 2</p> <ul style="list-style-type: none"> • Met: Describe types of outcome to complainant through use of mechanism: The Company explains the 'Possible outcomes of the investigation: The allegation could not be substantiated temporarily, case filing and pending for the future investigation; The allegation is substantiated with one or both of the following: Corrective action taken to ensure that the problem will not occur again; Disciplinary or appropriate legal action against the wrongdoer'. Lastly, 'The case involves reporting to the relevant law enforcement agencies, the Internal Audit Department will no longer be involved in the investigation'. [Whistleblowing Policy, 29/12/2017: geelyauto.com.hk]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not Met: Escalation to senior/independent level: The Company also indicates that 'If the report is extremely serious or in any way involves the Head of Internal Audit Department as the reporting subject, you should report it directly to the Chairman of the Audit Committee'. The Company provides the Chairman address. It is not clear this channel can be used by all external individuals and communities, and whether the escalation can be made at the complainants discretion to challenge the process or outcome. [Whistleblowing Policy, 29/12/2017: geelyauto.com.hk]
C.5	Prohibition of retaliation for raising complaints or concerns	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Public statement prohibiting retaliation: The Whistleblowing policy states that 'Persons making appropriate complaints in accordance with this policy are assured of protection against unfair dismissal, victimisation or unwarranted disciplinary action, even if the suspected concerns are confirmed to be unsubstantiated after formal internal investigation'. The policy scope includes 'Group at all levels and divisions, managements, employees and other related stakeholders'. [Whistleblowing Policy, 29/12/2017: geelyauto.com.hk] & [2020 CSR Report, 2021: geelyauto.com.hk] • Not Met: Practical measures to prevent retaliation: The Company indicates that 'The Group respect that sometimes you may wish to file the report in confidence. However, an anonymous allegation will be much more difficult for us to follow up simply because we will not be able to obtain further information from you and make a proper assessment. The Group generally do not encourage anonymous reporting which will usually not be considered, and encourage you to come forward with your concerns'. Moreover, 'Persons who victimise or retaliate against those who have raised concerns under this policy will be subject to disciplinary and/or legal actions'. However, no details found in relation to specific training regarding this policy in order to implement disciplinary or other actions to prevent retaliation. The 2020 CSR Report notes: 'To hear the true voice of employees, we developed an anonymous "Talk to the Tree Hole" mechanism for employees to speak up about things they "want to say but not dare to, want to say but no time to, want to say but no idea whom they should speak to"'. However, although the Company has a measure to prevent retaliation that covers its employees, the "Talk to the Tree Hole", no further evidence found of such measures that also includes individuals and communities. [Whistleblowing Policy, 29/12/2017: geelyauto.com.hk] & [2020 CSR Report, 2021: geelyauto.com.hk] <p>Score 2</p> <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: The Supplier Code of Conduct indicates: 'Suppliers shall not retaliate against the whistleblowers'. However, it is not clear this provision extends to suppliers' workers and external stakeholders.
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"> • Not Met: Complainants not asked to waive rights • Not Met: Company does not require confidentiality provisions <p>Score 2</p> <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	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <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 <p>Score 2</p> <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 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"> • Not Met: Number grievances filed, addressed or resolved and outcome achieved: It indicates: 'During the Reporting Period, a total of 339 reported complaints (including 320 compliance complaints and 19 performance complaints) were all addressed in a timely manner with proper feedback to the corresponding employees filing the complaints and they were satisfied with the handling outcome'. However, no further information found including the number of grievances about human rights issues filed, addressed or resolved and outcomes

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>achieved for its own workers, for external individuals and communities that may be adversely impacted by the Company. [2020 CSR Report, 2021: geelyauto.com.hk]</p> <ul style="list-style-type: none"> • Not Met: How lessons from mechanism improve management system <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Evaluation of the channel/mechanism and changes made as result: The previous explanation read: The Company indicates that 'The effectiveness of this whistleblowing policy will be monitored and reviewed periodically by Internal Audit Department'. However, no description found of the process to review the effectiveness of the grievance mechanism and any changes made to improve it based on the review. [Whistleblowing Policy, 29/12/2017: geelyauto.com.hk] • Not Met: Describes procedures to address delays of outcomes agreed with stakeholders

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

D.5 Automotive Manufacturing

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.5.1.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"> • Not Met: Pays living wage or sets target date: The Company indicates, in its 2019 CSR Report, that it has signed the 'Income-Specialised Collective Contract'. Moreover, it states that 'Geely continues to refine our company welfare system, which provides seasonal, festive and birthday benefits, annual health check, as well as subsidies for housing, transport, meals, telecommunication and discounts for car purchase. Similarly, Geely strictly abides to the national laws and standards for annual, sick, maternity and paternity, as well as compassionate leave'. Also, 'we have created a "tiered, hierarchical and transparent" performance evaluation and encouragement system to bring Geely's welfare and competitive opportunities to employee in a fair and open manner'. The System is meant to all employees. 'For front-line employees, Geely has built an income system which combines basic salary for position-specific work done and performance-based bonuses'. The Code of Business Conduct states: 'Geely undertakes to comply with internationally accepted human rights and labor standards and provide fair salary and welfare, paid leave as well as health protection in accordance with applicable laws and regulations and local market conditions'. However, it is not clear the Company has a time bound target for paying all workers a living wage or that it pays all workers a living wage. A living wage should include basic needs plus some discretionary for employees and his/her family and/or depends. [2019 CSR Report, 04/2020: geelyauto.com.hk] & [Code of Business Conduct, 18/03/2022: geelyauto.com.hk] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describes how living wage determined • Not Met: Paying living wage • Not Met: Definition of living wage reviewed with unions
D.5.1.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"> • Not Met: Discloses living wage requirements in supplier code or contracts: The Supplier Code of Conduct indicates: 'Suppliers shall pay employees wages and benefits that meet or exceed the local legal minimum standards'. However, it is not clear it has a timebound target for requiring its suppliers to pay all workers a living wage or that the company includes requirements to pay workers a living wage in its contractual arrangements with its suppliers or its supplier code of conduct. A living wage should cover basic needs and provide some discretionary for employees and his/her family and or depends. [2020 CSR Report, 2021: geelyauto.com.hk] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Improving living wage practices of suppliers • Not Met: Assessment of number affected by payment below living wage • Not Met: Provides analysis of trends demonstrating progress
D.5.2	Aligning purchasing decisions with human rights	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • 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 <p>Score 2</p> <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

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.5.3	Mapping and disclosing the supply chain	0	The individual elements of the assessment are met or not as follows: Score 1 • Not Met: Identifies direct and indirect suppliers back to manufacturing sites (factories or fields) Score 2 • 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.5.4.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 • Met: Does not use child labour: The Company indicates: 'Geely prohibits the use of child labor and forced labor for its businesses'. [Code of Business Conduct, 18/03/2022: geelyauto.com.hk] • Not Met: Age verification of workers recruited Score 2 • Not Met: Remediation if children identified
D.5.4.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 • Not Met: Child Labour rules in codes or contracts: The Supplier Code of Conduct indicates: 'Suppliers shall not use child labor in any form. It is not allowed to hire minors below the minimum age of workers stipulated by applicable laws'. However, no evidence found of child labour requirements, including verifying the age of workers recruited, and remediation programmes, within its contractual arrangements with its suppliers or supplier code of conduct. [Supplier Code of Conduct, 2021: geelyauto.com.hk] • Not Met: How working with suppliers on child labour Score 2 • Not Met: Assessment of number affected by child labour in supply chain • Not Met: Analysis of trends in progress made
D.5.5.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 • Not Met: Job seekers and workers do not pay recruitment fee: The Company indicates: 'Geely prohibits the use of child labor and forced labor for its businesses'. However, no further evidence found that seekers and workers do not pay any recruitment fees or related costs to secure a job (The Employer Pays Principle). [Code of Business Conduct, 18/03/2022: geelyauto.com.hk] • Not Met: Commits to fully reimbursing if they have paid Score 2 • Not Met: How practices are implemented and monitored for agencies, labour brokers or recruiters
D.5.5.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 • Not Met: Debt and fees rules in codes or contracts: The Supplier Code of Conduct indicates: 'Suppliers shall not use any form of force labor'. However, no further evidence found that the Company prohibits suppliers and any third-party recruitment intermediaries from imposing financial burdens on job seekers and workers by collecting recruitment fees or related costs. [Supplier Code of Conduct, 2021: geelyauto.com.hk] • Not Met: How working with suppliers on debt & fees Score 2 • Not Met: Assessment of the number affected by payment of recruitment fees • Not Met: Analysis of trends in progress made
D.5.5.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 • Not Met: Pays workers in full and on time: It indicates: 'Geely undertakes to comply with internationally accepted human rights and labor standards and provide fair salary and welfare, paid leave as well as health protection in accordance with applicable laws and regulations and local market conditions'. However, no further evidence found where it indicates that it pays workers regularly, in full and on time. [Code of Business Conduct, 18/03/2022: geelyauto.com.hk] • Not Met: Payslips show any legitimate deductions Score 2 • Not Met: How these practices are monitored for agencies, labour brokers or recruiters

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.5.5.d	Prohibition of forced labour: Wage practices (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"> Met: Requirement for suppliers to pay workers in full and on time in codes or contracts: The Supplier Code of Conduct indicates: 'Wages and benefits shall be paid in full and in a timely manner in accordance with applicable laws and regulations'. [Supplier Code of Conduct, 2021: geelyauto.com.hk] 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.5.5.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: The Company indicates: 'Geely prohibits the use of child labor and forced labor for its businesses'. However, no further evidence found indicating that it does not retain workers' personal documents or restrict workers' freedom of movement or require workers to use Company provided accommodation. [Code of Business Conduct, 18/03/2022: geelyauto.com.hk] Score 2 <ul style="list-style-type: none"> Not Met: How these practices are monitored for agencies, labour brokers or recruiters
D.5.5.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: The Supplier Code of Conduct indicates: 'Suppliers shall not use any form of force labor'. However, no further evidence found that the Company prohibits suppliers from retaining workers' personal documents or restricting workers' freedom of movement or requiring workers to use company provided accommodation. [Supplier Code of Conduct, 2021: geelyauto.com.hk] Score 2 <ul style="list-style-type: none"> Not Met: How working with suppliers on free movement Not Met: Assessment of the number affected by retaining docs or restricting movement Not Met: Provides analysis of trends demonstrating progress
D.5.6.a	Freedom of association and collective bargaining (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"> Not Met: Commits not to interfere with union rights / Steps to avoid intimidation or retaliation: The proportion of employees in labor union in 2020 was 100. High union recognition, in this case 100 percent, is taken as a proxy for not intimidating or retaliating. However, no commitment found to not interfering with the right of workers to form or join trade unions (or equivalent worker bodies where the right to freedom of association and collective bargaining is restricted under law) to bargain collectively. [2020 CSR Report, 2021: geelyauto.com.hk] Met: Discloses % total direct operations covered by collective CB agreements: The proportion of employees in labor union in 2020 was 100. [2020 CSR Report, 2021: geelyauto.com.hk] Score 2 <ul style="list-style-type: none"> Not Met: Meets both requirements under score 1
D.5.6.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: The Supplier Code of Conduct indicates: 'Supplier shall not engage in any form of discrimination against any employee based on (...) union affiliation'. However, it is not clear whether the Company requires suppliers to respect the right of all workers to form and join a trade union of their choice (or equivalent worker bodies where the right to freedom of association and collective bargaining is restricted under law) and to bargain collectively in all contexts. Moreover, no further requirement prohibiting intimidation, harassment, retaliation and violence against trade union members and trade union representatives found. [Supplier Code of Conduct, 2021: geelyauto.com.hk] 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.5.7.a	Health and safety: Fatalities, lost days, injury, occupational disease rates (in own production of 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"> • Met: Describes process to identify H&S risks and impacts: The Company indicates that in 2020: ‘we upgraded our HSE system, strengthened work safety control and safety culture development, and improved risk identification and hidden hazard detection and rectification to continuously improve safety management. (...) we formulated a comprehensive management system with risk management as the core of safety standardization. We strengthened the monitoring and measurement of KPIs and continued to promote standardized systems. During the Reporting Period, we standardized the occupational health and work safety management of all production plants with the procedure documents, standards, and assessment criteria of our HSE management system’. It notes that it has different policies addressing health and safety, also: ‘each production plant refined its HSE management system based on the features of its own manufacturing processes. Our Work Safety Committee organized regular safety inspections to ensure safety management. To ensure the implementation of our HSE management system, we developed the HSE Management System Evaluation Criteria (...) to evaluate the occupational health and safety performance of each production plant, and established a professional HSE audit team. We have a three-tier overall safety management structure consists of the Work Safety Committee of the Group, work safety committees of subsidiaries, and work safety leading groups of production plants. We established the Safety and Environmental Protection Department at the Group level, safety and environmental protection departments in the subsidiaries, and safety officers and dedicated safety management staff in the production plants. These units have different responsibilities and collaborate to implement work safety’. [2020 CSR Report, 2021: geelyauto.com.hk] • Met: Injury Rate or Lost days or Near Miss disclosures for last reporting period: It indicates that the rate of severe injuries in 2020 was 0 and the rate of minor injuries for the same period was 0.36. [2020 CSR Report, 2021: geelyauto.com.hk] • Met: Discloses Fatalities for last reporting period: There was 1 work-related fatality in 2020. [2020 CSR Report, 2021: geelyauto.com.hk] • Met: Occupational disease rate for last reporting period: The rate of occupational diseases in 2020 was 0. [2020 CSR Report, 2021: geelyauto.com.hk] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Set targets for H&S performance: The Company indicates: ‘In 2020, we achieved the goals on accident indicators, rectification of hidden hazards, and Health, Safety and Environment (“HSE”) evaluation’. It discloses its goals accomplished: ‘Class 4 accidents: 0.035‰, Class 3 accidents: 0.2‰, Class 2 accidents: 3‰, Normal class and above fire accidents: 0.05‰’. However, it is not clear it has set targets related to injury rates or lost days (or near miss frequency rate) and fatalities and occupational disease rates for the last reporting period. [2020 CSR Report, 2021: geelyauto.com.hk] • Not Met: Met targets or explain why not or what is doing to improve management systems: As indicated above: ‘In 2020, we achieved the goals on accident indicators, rectification of hidden hazards, and Health, Safety and Environment (“HSE”) evaluation’. It discloses its goals accomplished: ‘Class 4 accidents: 0.035‰, Class 3 accidents: 0.2‰, Class 2 accidents: 3‰, Normal class and above fire accidents: 0.05‰’. However, although the Company indicates it has set specific health and safety targets and met them, it is not clear it has set targets related to injury rates or lost days (or near miss frequency rate) and fatalities and occupational disease rates for the last reporting period. [2020 CSR Report, 2021: geelyauto.com.hk]
D.5.7.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"> • Not Met: Sets out clear Health and Safety requirements: The Supplier Code of Conduct indicates: ‘Suppliers shall comply with all applicable health and safety laws and regulations. (...) Suppliers shall take effective measures to prevent accidents and formulate emergency plans. Suppliers shall also provide guidance to employees to reduce health and safety risks and impacts’. However, no further details found of health and safety requirements. The Company is expected to set specific health and safe requirements for suppliers. [Supplier Code of Conduct, 2021: geelyauto.com.hk] • Not Met: Injury rate disclosures and lost days (or near miss disclosures) for the last reporting period • Not Met: Fatalities disclosures for lasting reporting period • Not Met: Occupational disease rates for the last reporting period <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: How working with suppliers on H&S

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not Met: Assessment of the number affected by H&S issues in the SP • Not Met: Provide analysis of trends in progress made
D.5.8.a	Women's rights (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"> • Not Met: Process to stop harassment and violence against women: The Company indicates, in its 2018 CSR Report, that 'With an "open, respectful and tolerate" attitude, we have created a harmonious working environment for each employee'. Moreover, in its 2019 CSR Report, it states that 'We reject discrimination stemming from (...) gender'. However, it is not clear its processes to prohibit harassment, intimidation and violence against women. [2018 Social Responsibility Report, 06/2019: geelyauto.com.hk] & [2019 CSR Report, 04/2020: geelyauto.com.hk] • Not Met: Working conditions take account of gender: The Company indicates that 'With our employees, we have signed 7 collective contracts, including (...) the Regulations Concerning the Labour Protection of Female Staff and Worker'. However, it is not clear how it takes into account differential impacts on women and men of working conditions, including to reproductive health. [2019 CSR Report, 04/2020: geelyauto.com.hk] • Not Met: Measures and steps to address gender pay gap at all levels of employment: It indicates: 'Geely undertakes to provide equal opportunities to all employees, prohibit any discrimination based on (...) gender, (...) and foster a diversified work environment where different opinions, perspectives and beliefs are respected by actively promoting diversity among employees'. However, it is not clear the measures and steps it takes to address any gender pay gap throughout all levels of employment. [Code of Business Conduct, 18/03/2022: geelyauto.com.hk] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meet all requirements under score 1 • Not Met: Provides analysis of trends demonstrating closing gender pay gap
D.5.8.b	Women's rights (in the supply chain)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Women's rights in codes or contracts: The Supplier Code of Conduct indicates: 'Supplier shall not engage in any form of discrimination against any employee based on gender, (...)'. However, no further evidence found that the Company requires suppliers to provide equal pay for equal work, introduce measures to ensure equal opportunities throughout all levels of employment and to eliminate health and safety concerns that are particularly prevalent among women workers. [Supplier Code of Conduct, 2021: geelyauto.com.hk] • Not Met: How working with suppliers on women's rights <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment on the number affected by discrimination or unsafe working conditions • Not Met: Provide analysis of trends in progress made
D.5.9.a	Working hours (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"> • Not Met: Respects max hours, min breaks and rest periods in its own operations: The Company indicates: 'To protect the rights & interests of employees and build a good labour relation, we set policies on working hours, holiday arrangements (...)'. However, no further details of this policy on working hours found. It is not clear it indicates that it respects applicable international standards concerning maximum hours and minimum breaks and rest periods in its own operations. [2020 CSR Report, 2021: geelyauto.com.hk] • Not Met: Assesses ability to comply with its commitments when allocating work/targets <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets both requirements under score 1 • Not Met: How it implements and checks this in its operations
D.5.9.b	Working hours (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"> • Not Met: Working hours in codes or contracts: The Supplier Code of Conduct indicates: 'Suppliers shall comply with applicable laws regarding working hours, including but not limited to overtime and overtime compensation'. However, no evidence found, in its Supplier Code of Conduct or contractual arrangements, of a supplier requirement to respect applicable international standards concerning maximum hours and minimum breaks and rest periods. [Supplier Code of Conduct, 2021: geelyauto.com.hk] • Not Met: How working with suppliers on working hours <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of number affected by excessive working hours

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not Met: Provide analysis of trends in progress made
D.5.10.a	Responsible Mineral Sourcing: Arrangements with suppliers and smelters/refiners in the mineral resource supply chains	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"> • Not Met: Due diligence in accordance with OECD Guidance in supplier contracts: The Supplier Code of Conduct indicates: ‘Suppliers shall exercise due diligence in their supply chain to ensure that the extraction or trade of minerals or metals contained in the products supplied to Geely does not infringe on human rights, violate business ethics, or harm the environment, and the proceeds from sales shall not be used to fund armed conflicts’. The Supplier Code of Conduct ‘shall be deemed an integral part of any agreement between the Supplier and Geely. During their business relationship with Geely, suppliers shall comply with applicable laws and regulations as well as the principles set out in the Code’. However, it is not clear suppliers are expected to conduct due diligence in accordance with the OECD Guidance for at least 3TG. [Supplier Code of Conduct, 2021: geelyauto.com.hk] • Not Met: Works with smelters/refiners and suppliers to build capacity <p>Score 2</p> <ul style="list-style-type: none"> • Met: Contractual requirement to disclosure smelter/refiner information: The Supplier Code of Conduct indicates: ‘Suppliers shall support and cooperate with Geely’s efforts to secure full transparency and traceability of its conflict mineral supply chain’. The Supplier Code of Conduct ‘shall be deemed an integral part of any agreement between the Supplier and Geely. During their business relationship with Geely, suppliers shall comply with applicable laws and regulations as well as the principles set out in the Code’. [Supplier Code of Conduct, 2021: geelyauto.com.hk] • Not Met: Contractual requirement covers all minerals
D.5.10.b	Responsible Mineral Sourcing: Risk identification in mineral 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"> • Not Met: Risk identification and disclosure in line with OECD Guidance • Not Met: Identification of smelter/refiners and OECD Guidance <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Discloses smelters/refiners judged in line with OECD Guidance • Not Met: Risk identification and disclosure covers all minerals
D.5.10.c	Responsible Mineral Sourcing: Risk management in the mineral 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"> • Not Met: Describes mineral risk management plan for supply chain • Not Met: Monitoring, tracking and whether better risk prevention/mitigation over time • Not Met: Disclose better risk prevention/mitigation over time <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Suppliers and stakeholders engaged in risk management strategy • Not Met: Risk management and response processes cover all minerals
D.5.11	Responsible Materials Sourcing	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"> • Not Met: Due diligence for raw materials in supplier code/contracts • Not Met: Works with suppliers to build capacity in risk assessment and due diligence <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets all requirements under score 1 • Not Met: Identify the sources of high-risk raw materials in its supply chain

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"> • Area: Forced labour; discrimination • Headline: Geely among companies accused of using forced Uyghur labour in China • Story: On March 1st., 2020, the Australian Strategic Policy Institute (ASPI) released a report that named Walmart among 83 other companies benefiting from the use of potentially abuse labour transfer programs. <p>According to the report, more than 80,000 Uyghur residents and former detainees from the north-western region of Xinjiang, China have been transferred to factories, implicating global supply chains. It is alleged that Muslim minorities are thought to be working in forced labour conditions across the country.</p> <p>The ASPI report said that workers live in segregated dormitories, are required to study Mandarin and undergo ideological training. The workers were transferred out of Xinjiang between 2017 and 2019, claiming that people are being effectively "bought" and "sold" by local governments and commercial brokers. ASPI used open-source public documents, satellite imagery, and media reports and identified 27 factories in nine Chinese provinces that have used labourers.</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 Uyghur labour under a state-sponsored labour transfer scheme that is tainting the global supply chain".</p> <p>Geely is linked to the forced labour allegations via its supplier O-Film Technology CO. LTD. [Australian Strategic Policy Institute, 01/03/2020, "Uyghurs for sale": aspi.org.au] [Business and Human Rights Resource Centre, 01/03/2020, "China: 83 major brands implicated in report on forced labour of ethnic minorities from Xinjiang assigned to factories across provinces; Includes company responses": business-humanrights.org]</p>
E(1).1	The company has responded publicly to the allegation	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"> • Not Met: Public response: A response by the company is not publicly available. <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Detailed response: A response by the company is not publicly available.
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"> • Not Met: Engaged with stakeholders • Not Met: Identified cause <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Identified and implemented improvements • Not Met: Stakeholder input to steps taken
E(1).3	The company has engaged with affected stakeholders to provide for or cooperate in remedy(ies)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Provided remedy • Not Met: Evidence for lack of Impact or link <p>Score 2</p> <ul style="list-style-type: none"> • 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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