

Company Name George Weston (Weston Foods & Loblaw)
Industry Agricultural Products (Supply Chain only)
Overall Score 10.4 out of 100

Theme Score	Out of	For Theme
0.8	10	A. Governance and Policies
1.1	25	B. Embedding Respect and Human Rights Due Diligence
2.0	20	C. Remedies and Grievance Mechanisms
4.4	25	D. Performance: Company Human Rights Practices
2.1	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	<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: General HRs commitment: The Company 'has two operating segments: Loblaw Companies Limited ("Loblaw"), Canada's largest food and drug retailer and a provider of financial services, and Choice Properties Real Estate Investment Trust ("Choice").' The evaluation is focused on their food segment. Loblaw states in its 'Our position on human rights' document: 'Our commitment to Human Rights applies to our customers and the nearly 200,000 Canadians who work in our network of stores, offices and facilities nationwide. It also applies to our business partners and suppliers, including full time, part time, migrant and temporary workers employed within our wider supply chain'. [Loblaw - Our position on human rights: loblaw.ca] • Not Met: Universal Declaration of Human rights (UDHR) • Not Met: International Bill of Human Rights <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Commitment to the UNGPs: Loblaw's document 'Our position on human rights' reads: 'Our policies and practices are informed by the following international and industry-leading standards: The United Nations' Guiding Principles on Business and Human Rights and Universal Declaration of Human Rights'. However, 'to be informed' is not considered a formal statement of commitment according to CHRB wording criteria. [Loblaw - Our position on human rights: loblaw.ca] • Not Met: Commitment to the OECD Guidelines for Multinational Enterprises
A.1.2.a	Commitment to respect the human rights of	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: Company has a commitment to the ILO Core • Not Met: Company has an explicit commitment to All four ILO Core

Indicator Code	Indicator name	Score (out of 2)	Explanation
	workers: ILO Declaration on Fundamental Principles and Rights at Work		<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: Loblaw Supplier Code includes provision covering all ILO Core. With respect freedom of association and collective bargaining, it indicates: 'Permit workers or their representatives to associate and bargain collectively or refrain from doing so, in accordance with local law. Allow these worker activities to take place in the workplace. Workers shall have the opportunity to freely communicate and engage with management to discuss working conditions without fear of unjust treatment.' However, it is not clear whether the Company requires to respect those rights in all contexts, as it indicates 'in accordance with local law'. In these cases (companies referring to local laws in freedom of association and collective bargaining), companies are expected to require alternative mechanisms or equivalent workers bodies where the right to freedom of association and collective bargaining is restricted under law. [Loblaw - Supplier Code, N/A: loblaw.ca]
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"> • Met: Commitment to respect H&S of workers: The Company indicates in its Code of Conduct: 'The Company is committed to making our environment safe for employees.' [Code of Conduct, 44197: cdn.metro.net] • 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: Loblaw Supplier Code indicates: 'Protect the health and safety of your workers by complying with applicable health and safety laws.' [Loblaw - Supplier Code, N/A: loblaw.ca] • Not Met: Expect suppliers to commit to ILO labour standard or to 48 hours regular work week
A.1.3.a.AG	Commitment to respect human rights particularly relevant to the industry – land, natural resources and indigenous peoples' rights (AG)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Respect land ownership and natural resources as set out in VGGT • Not Met: Respect land ownership and natural resources as set out in The IFC Performance Standards • Not Met: Respecting indigenous peoples' rights or ILO Convention No.169 or UN Declaration • Not Met: Expecting suppliers to make these commitments <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Respecting the right to water • Not Met: Company's policy commits to obtain FPIC • Not Met: Expecting suppliers to make these commitments
A.1.3.b.AG	Commitment to respect human rights particularly relevant to the industry – vulnerable groups (AG)	0	<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 at least one of these rights <p>Score 2</p> <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	<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: The Company commits to remedy • Not Met: Company expect suppliers to make this commitment <p>Score 2</p> <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	<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: Zero tolerance attacks on HRs Defenders (HRDs) • Not Met: Company expect suppliers to make this commitment <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Work with HRD to create safe and enabling environment

A.2 Policy Commitments (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.2.1	Commitment from the top	0	<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: Board level responsibility for HRs: The Company states that the Governance, Human Resource, Nominating and Compensation Committee shall receive and review periodic reports from management on any elements of the Company's ESG program. Annually, the Committee will review the Company's ESG Report. However, there is no information on responsibility for human rights issues. The Company's food and pharmacy business, Loblaw Companies Limited states that the board level Risk and Compliance Committee is responsible for overseeing the company's legal and regulatory compliance and ethics program, cybersecurity, corporate social responsibility program, human rights and all policies, systems and programs related to pharmacy/pharmaceutical matters, food and product safety, as well as other matters. However, it is unclear if there is a group level responsibility for human rights issues. [Loblaw - 2020 CSR Report, 2020: loblaw.ca] & [Accounting, Auditing and Internal Controls Complaints Procedures, N/A: weston.ca] • Not Met: Describe HR expertise of Board member <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Speeches/letters by Board members or CEO
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"> • Not Met: Board/Committee review HRs strategy • Not Met: Examples/trends re HR discussion in the last reporting period <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets both requirements under score 1 • Not Met: How affected stakeholders/HR experts informed discussions
A.2.3	Incentives and performance management	0	<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: Incentives for at least one board member • Not Met: At least one key HR risk, beyond employee H&S <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Performance criteria made public • Not Met: Review of other board performance criteria
A.2.4	Business model strategy and risks	0	<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: Board process to review business model and strategy • Not Met: Describe frequency and triggers for reviewing <p>Score 2</p> <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	<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: Score of 1 on A.1.2.a • Not Met: Senior responsibility for HR implementation and decision making <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: How it assigns Day-to-day responsibility • Not Met: Day-to-day resources and expertise allocation in own ops • Not Met: Resources and expertise allocation in the supply chain
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"> • Not Met: Senior manager incentives for human rights [Annual Information Form, 31.12.2019: weston.ca] • Not Met: At least one key HR risk, beyond employee H&S [Annual Information Form, 31.12.2019: weston.ca] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Performance criteria made public • Not Met: Review of other senior management performance

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.3	Integration with enterprise risk management	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 risks is integrated as part of enterprise risk system: The Company states that it is committed to maintaining a framework that ensures risk management is an integral part of its activities. The Company's Enterprise Risk Management ("ERM") program assists all areas of the business in managing risks within appropriate levels of tolerance by bringing a systematic approach and methodology for evaluating, measuring and monitoring key risks. The results of the ERM program and other business planning processes are used to identify emerging risks to the Company, prioritize risk mitigation activities and develop a risk-based internal audit plan. The key risks identified through the ERM program include labour relations in Loblaw. The labour relation refers to collective agreements issues. [2021 Annual Report, 2021: sedar.com] • Not Met: Provides an example <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Audit Ctte or independent risk assessment [Annual Information Form, 31.12.2019: weston.ca]
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"> • Not Met: Score of 1 on A.1.2.a • Not Met: Communicates its policy to all workers in own operations <p>Score 2</p> <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	<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: Meets ILO requirement for suppliers on A.1.2.a • Not Met: Steps to communicate policy commitments to supply chain • Met: Requires suppliers to communicate policy requirements: The Company's food and pharmacy business, Loblaw Companies Limited has a Supplier Code of Conduct, which includes human rights requirements. Loblaw states that it requires that its suppliers share its Supplier Code with their contractors, agents, sub-contractors and sub-agents, including any labour agencies that are engaged to assist with providing goods or performing services for Loblaw. [Loblaw - Supplier Code, 01/2022: loblaw.ca] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: How HR commitments made binding/contractual: Loblaw states in its Supplier Code of Conduct that 'by entering into any standard terms and conditions or other contractual agreements with the Company (the "Governing Terms"), you are accepting the terms of the Code (as amended from time to time) and affirming compliance with its requirements. The Code is not to be read in lieu of but in addition to your obligations as set out in the Governing Terms.' However, it is not clear how its human rights policy is reflected within contractual or other binding arrangements. [Loblaw - Supplier Code, 01/2022: loblaw.ca] • 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 • Not Met: How workers are trained on HR policy commitments: Loblaw states that it requires its employees to complete an annual Code of Conduct training module. The Company states in its Code of Conduct that it recognizes its responsibility to respect and protect the human rights of customers and workers. However, it does not have a detailed requirement on how it respect or protect human rights. There is no description on how training is carried out. [Loblaw - Our position on human rights: loblaw.ca] • 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 • Not Met: Meets both requirements under score 1 • Not Met: Trains suppliers to meet company's HR commitment • Not Met: Disclose % trained
B.1.6	Monitoring and corrective actions	0.5	<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 • Not Met: Monitoring implementation of HR policy commitments across global ops and supply chain

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			<ul style="list-style-type: none"> • Not Met: Proportion of supply chain monitored: Loblaw reported that in 2020, it has reviewed and performed 2,453 audits at more than 2,100 active factories globally. However, it has not report on the proportion of supply chain monitored. [Loblaw - 2020 CSR Report, 2020: loblaw.ca] • Not Met: Describe how workers are involved in monitoring Score 2 <ul style="list-style-type: none"> • Not Met: Score of 2 on A.1.2.a • Met: Describes corrective action process: Loblaw states that Supplier Code violations are reported to its Supply Chain Compliance and Compliance and Ethics departments. It evaluates the severity of violations to determine appropriate corrective action plans to address issues of non-compliance. Serious or repeated violations by a supplier may result in factories and/or suppliers being delisted permanently. It will only issue purchase orders to suppliers that adhere to its factory audit requirements and continue to be compliant with its standards. [Loblaw - 2020 CSR Report, 2020: loblaw.ca] • Not Met: Disclose findings and number of corrective action
B.1.7	Engaging and terminating 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: HR affects selection of suppliers: Loblaw states that it will only issue purchase orders to suppliers that adhere to its factory audit requirements and continue to be compliant with its standards. However, it is unclear whether this only applies to existing relationships or whether new suppliers are chosen based on audit results. [Loblaw - 2020 CSR Report, 2020: loblaw.ca] • Met: HR affects on-going supplier relationships: Loblaw states that serious or repeated violations by a supplier may result in factories and/or suppliers being delisted permanently. [Loblaw - 2020 CSR Report, 2020: loblaw.ca] & [Loblaw - Supplier Code, 01/2022: loblaw.ca] Score 2 <ul style="list-style-type: none"> • Not Met: Describe positive incentives offered to respect human rights • Not Met: Working with suppliers to meet HR requirements
B.1.8	Approach to engagement with affected stakeholders	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Stakeholder process or systems to identify and engage with workers/communities in the last two years • Not Met: Discloses stakeholders that HRs may be affected • Not Met: Provides two examples of engagement with stakeholders Score 2 <ul style="list-style-type: none"> • Not Met: Analysis of stakeholder views on company's HR issues • Not Met: Describe how views influenced company's HR approach

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.1	Identifying human rights risks and impacts	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Identifying risks in own operations • Not Met: Identifying risks through relevant business relationships Score 2 <ul style="list-style-type: none"> • Not Met: Describe ongoing global risk identification in consultation with stakeholder/HR experts • Not Met: Triggered by new circumstances • Not Met: Describes risks identified
B.2.2	Assessing human rights risks and impacts	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Describe process for assessment of HR risks and discloses salient HR issues • Not Met: How process applies to supply chain • Not Met: Public disclosure of the results of HR assessment Score 2 <ul style="list-style-type: none"> • Not Met: Meets all requirements under score 1 • Not Met: How it involved affected stakeholders in the assessment
B.2.3	Integrating and acting on human rights risks and impact assessments	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Action Plans to mitigate risks • Not Met: Description of how global system applies to supply chain • Not Met: Example of actions decided on at least 1 salient HR issues Score 2 <ul style="list-style-type: none"> • Not Met: Meets all requirements under score 1 • Not Met: Involve stakeholders in decisions about actions

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.4	Tracking the effectiveness of actions to respond to human rights risks and impacts	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: System for tracking or monitor if actions taken are effective • Not Met: Lessons learnt from checking system effectiveness Score 2 <ul style="list-style-type: none"> • Not Met: Meets both requirements under score 1 • Not Met: Involve stakeholders in evaluation of actions taken
B.2.5	Communicating on human rights impacts	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Provides two examples of comms with stakeholders Score 2 <ul style="list-style-type: none"> • Not Met: Describe challenges to effective comms and how it is working to address them

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.1	Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers	1.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Channel accessible to all workers: The Company has a Compliance or the Integrity Action Line for workers to report a violation of the Code. 'The Integrity Action Line is an externally managed reporting service available for you to relay concerns or issues to the Company. By reporting through the Integrity Action Line, you may choose to remain anonymous. The Company treats all reports seriously and with appropriate confidentiality. When appropriate, the Company will consult with and report to external authorities.' [Code of Conduct, 44197: cdn.metrio.net] & [Environment, Social and Governance, N/A: weston.ca] Score 2 <ul style="list-style-type: none"> • Met: Channel is available in all appropriate languages and workers aware: The Company has a Compliance or the Integrity Action Line for workers to report a violation of the Code. However, there is no information on language appropriate. The Company's food and pharmacy business, Loblaw Companies Limited also has Integrity Action Line for immediately reporting suspicious activities, unethical practices, discriminatory or disrespectful behaviour, non-compliance and suspected non-compliance with laws and regulations, the Code or Company policies, procedures or training. The Line is available in seven languages. It also has website link available in three languages. [Code of Conduct, 44197: cdn.metrio.net] & [Loblaw - 2020 CSR Report, 2020: loblaw.ca] • Not Met: Describe how workers in the supply chain have access to grievance mechanism: The company says: "Suppliers shall monitor compliance of their operations with the terms of the Code and all Governing Terms. Further, Suppliers shall monitor Related Parties' compliance with the terms of the Code and immediately disclose any known violations to the Integrity Action Line or those Loblaw representatives noted in the Speak Up section." However, this does not describe if or how the suppliers' workers can access grievance mechanisms. [Loblaw - Supplier Code, 01/2022: loblaw.ca] • 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	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Grievance mechanism for community: The Company has a Compliance or the Integrity Action Line for workers to report a violation of the Code. However, there is not evidence found about if this channel is accessible to all external individuals and communities who may be adversely impacted by the Company. [Code of Conduct, 44197: cdn.metrio.net] Score 2 <ul style="list-style-type: none"> • Not Met: Describes accessibility and local languages and stakeholder awareness: The Company's food and pharmacy business, Loblaw Companies Limited also has Integrity Action Line for immediately reporting suspicious activities, unethical practices, discriminatory or disrespectful behaviour, non-compliance and suspected non-compliance with laws and regulations, the Code or Company policies, procedures or training. The Line is available in seven languages. It also has website link available in three languages. However, it is not clear whether it helps affected external stakeholders at its own operations are aware of it. [Loblaw Colleague Code of Conduct, N/A: loblaw.ca] • Not Met: Communities access mechanism direct or through suppliers • Not Met: Expect supplier to convey expectation to their own suppliers

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.3	Users are involved in the design and performance of the channel(s)/mechanism(s)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Engages users to create or assess system • Not Met: Examples (at least two) of how they do this Score 2 <ul style="list-style-type: none"> • Not Met: Engages with potential or actual users on the improvement of the mechanism • Not Met: Provides user engagement example (at least two) on improvement
C.4	Procedures related to the mechanism(s)/channel(s) are equitable, publicly available and explained	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Response timescales and how complainants will be informed: Loblaw states that reports received via the Integrity Action Line are managed by the Compliance and Ethics department and assigned for investigation as appropriate, with governance oversight provided by the Risk and Compliance Committee of the board. However, there is no description on the procedures for managing the complaints or concerns, or how the complainants are informed. [Loblaw - 2020 CSR Report, 2020: loblaw.ca] • Not Met: Describe support (technical, financial, etc) available for equal access by complainants Score 2 <ul style="list-style-type: none"> • Not Met: Describe types of outcome to complainant through use of mechanism • Not Met: Escalation to senior/independent level
C.5	Prohibition of retaliation for raising complaints or concerns	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Public statement prohibiting retaliation: The Company states that it prohibits employees from retaliating against anyone who speaks up in good faith with a concern against another employee. Any employee who retaliates against another employee who has made a report is subject to discipline up to and including termination of employment. Loblaw also states that it prohibits colleagues from retaliating against anyone speaking up in good faith. Examples of retaliation include dismissal, suspension or demotion. Any colleague who retaliates against anyone who has reported an incident or potential incident in good faith is subject to discipline, up to and including dismissal. However, it has not mention prohibiting retaliation against other stakeholders. [Code of Conduct, 44197: cdn.metrio.net] & [Loblaw Colleague Code of Conduct, N/A: loblaw.ca] • Met: Practical measures to prevent retaliation: The Company states that it treats all reports seriously and with appropriate confidentiality. When appropriate, the Company will consult with and report to external authorities. Loblaw also states that reports to the Integrity Action Line may be made anonymously. The privacy of the reporter will be respected, and confidential information will be shared only on a 'need to know' basic or if required by law. [Code of Conduct, 44197: cdn.metrio.net] & [Loblaw Colleague Code of Conduct, N/A: loblaw.ca] Score 2 <ul style="list-style-type: none"> • Met: Company indicate it will not retaliate against workers/stakeholders: The company says: "Retaliation against anyone, including employees, colleagues, or workers, speaking up in good faith is strictly prohibited." [2021 Environmental, Social and Governance Report - LOBLAW, 2022: loblaw.ca] • Met: Expects suppliers to prohibit retaliation against workers/stakeholders: The company says: "Loblaw expects cooperation and transparency during the compliance monitoring process. Specifically, we expect you to encourage and facilitate any communication with workers required for audits and not to take any retaliatory action whatsoever against workers who take part in this process." [Loblaw - Supplier Code, N/A: loblaw.ca]
C.6	Company involvement with state-based judicial and non-judicial grievance mechanisms	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Complainants not asked to waive rights • Not Met: Company does not require confidentiality provisions Score 2 <ul style="list-style-type: none"> • Not Met: Will work with state based non judicial mechanisms • Not Met: Example of issue resolved (if applicable)
C.7	Remedying adverse impacts	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Describes how remedy has been provided: The company says that 'The Company has an Incident Management Program to ensure that breaches of the Code and other disciplinary matters are appropriately tracked, investigated and remediated, and to ensure that root cause analysis is performed to prevent future

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>incidents.' However, no evidence of how the remedy has been actually provided was found. [Code of Conduct, 44197: cdn.metro.net]</p> <ul style="list-style-type: none"> • Not Met: Says how it would provide remedy for victims if no adverse impact identified: The company states that 'We keep records of our marketing and labelling reviews and approvals and keep track of customer complaints related to marketing and labelling. Incidents are logged and actioned in order to remedy any issues.' However, no further details of how the remedy would be provide is given. [2021 Environmental, Social and Governance Report - LOBLAW, 2022: loblaw.ca] <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: The company does not provide this information, it says "This information cannot be disclosed for confidentiality reasons." [2021 Environmental, Social and Governance Report - LOBLAW, 2022: loblaw.ca] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: How lessons from mechanism improve management system • Not Met: Evaluation of the channel/mechanism and changes made as result • Not Met: Describes procedures to address delays of outcomes agreed with stakeholders

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.1.1.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 timebound target for suppliers to pay living wage or include in code or contracts: The Company's food and pharmacy business, Loblaw Companies Limited states in its Supplier Code of Conduct that its suppliers should pay workers regularly, on time and at least the minimum wage in the applicable jurisdiction. It encourages Suppliers to commit to the betterment of wage and benefit levels to address the basic needs of workers and their families. However, it is not clear whether the Company has a policy at a group level. [Loblaw - Supplier Code, 01/2022: loblaw.ca] <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.1.2	Aligning purchasing decisions with human rights	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • 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
D.1.3	Mapping and disclosing the supply chain	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: Identifies direct and indirect suppliers back to manufacturing sites (factories or fields): Loblaw has listed up the factories that it sources apparel and footwear products from. [Loblaw apparel supply chain disclosure, 03/11/2021: loblaw.ca] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Discloses names and locations of significant parts of SP and why: See above. [Loblaw apparel supply chain disclosure, 03/11/2021: loblaw.ca] • Not Met: Discloses which direct or indirect suppliers is involved in higher-risk activities

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.1.4.b	Prohibition of child labour: Age verification and corrective actions (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Child Labour rules in codes or contracts: Loblaw states in its Supplier Code of Conduct that suppliers should not employ workers that are under 16 years of age, save and except, employing a minor, between the ages of 12- 15 working on a farm owned or operated by a parent or guardian of the minor (family farm exception). Suppliers should ensure that workers between the age of 16 through 18 have the benefit of working hours, conditions and other benefits that are appropriate to their age and do not jeopardize their health or safety or compromise their education. However, no evidence found on how the Company verifies the applicant's age. [Loblaw - Supplier Code, 01/2022: loblaw.ca] • Not Met: How working with suppliers on child labour: The company says that 'Do not employ workers that are under 16 years of age, save and except, employing a minor, between the ages of 12- 15 working on a farm owned or operated by a parent or guardian of the minor (family farm exception).' However, no evidence was found on how the company monitors these hires. Score 2 <ul style="list-style-type: none"> • Not Met: Assessment of number affected by child labour in supply chain • Not Met: Analysis of trends in progress made
D.1.5.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"> • Met: Debt and fees rules in codes or contracts: Loblaw states that suppliers should not require workers to pay recruitment fees or costs, deposit funds, or their personal documents with the Supplier as a condition of their employment or pay fees as a form of discipline. Suppliers shall ensure that labour agencies used by the Supplier, particularly with respect to recruitment for migrant workers, do not engage in any of these prohibited practices. [Loblaw - Supplier Code, 01/2022: loblaw.ca] • Not Met: How working with suppliers on debt & fees: The company says that 'Do not require workers to pay recruitment fees or costs, deposit funds, or their personal documents with the Supplier as a condition of their employment or pay fees as a form of discipline. Suppliers shall ensure that labour agencies used by the Supplier, particularly with respect to recruitment for migrant workers, do not engage in any of these prohibited practices.' However, this only describes requirements the suppliers have to follow. The company does not provide information on how it supports the suppliers in meeting these requirements or how it carries out capacity building with the suppliers. [Loblaw - Supplier Code, N/A: loblaw.ca] Score 2 <ul style="list-style-type: none"> • Not Met: Assessment of the number affected by payment of recruitment fees • Not Met: Analysis of trends in progress made
D.1.5.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: Suppliers to pay workers in full and on time in codes or contracts: Loblaw states that suppliers should pay workers regularly, on time and at least the minimum wage in the applicable jurisdiction. It also states that suppliers should ensure workers are paid all wages owing to them and only deductions permitted by applicable laws are made from a worker's wages. [Loblaw - Supplier Code, 01/2022: loblaw.ca] • Not Met: How working with supply chain to pay workers regularly and on time: The company only discloses requirements its suppliers have to meet. It does not describe the ways in which it works with the suppliers to support them in meeting the requirements or any form of capacity building it carries out with the suppliers. [Loblaw - Supplier Code, 01/2022: loblaw.ca] Score 2 <ul style="list-style-type: none"> • Not Met: Assessment of the number affected by failure to pay directly • Not Met: Provides analysis of trends demonstrating progress
D.1.5.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"> • Met: Free movement rules in codes or contracts: Loblaw states that suppliers should not unreasonably restrict worker's freedom of movement at the workplace, require them to remain in the workplace after the conclusion of their working hours or illegally confine them. [Loblaw - Supplier Code, 01/2022: loblaw.ca] • Not Met: How working with suppliers on free movement Score 2 <ul style="list-style-type: none"> • Not Met: Assessment of the number affected by retaining docs or restricting movement • Not Met: Provides analysis of trends demonstrating progress

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.1.6.b	Freedom of association and collective bargaining (in the supply chain)	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Met: FoA & CB rules in codes or contracts: Loblaw states in its Supplier Code of Conduct that suppliers should permit workers or their representatives to associate and bargain collectively or refrain from doing so, in accordance with local law. Allow these worker activities to take place in the workplace, in accordance with any collective agreement and/or local laws. Workers shall have the opportunity to freely communicate and engage with management to discuss working conditions without fear of unjust treatment. Worker representatives or members of trade unions should not be discriminated against or otherwise penalized because of their membership in or affiliation with a trade union or worker organization in accordance with applicable legal requirements in the jurisdiction in which the supplier operates. [Loblaw - Supplier Code, 01/2022: loblaw.ca] Not Met: How working with suppliers on FoA and CB <p>Score 2</p> <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
D.1.7.b	Health and safety: Fatalities, lost days, injury, occupational disease rates (in the supply chain)	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Met: Sets out clear Health and Safety requirements: Loblaw states in its Supplier Code of Conduct that it requires its suppliers' commitment, and that of suppliers' related parties, to providing and maintaining a safe and healthy working environment. [Loblaw - Supplier Code, 01/2022: loblaw.ca] Not Met: Injury Rate or Lost days or Near miss disclosures for last reporting period: Loblaw reports that lost time frequency was 2.46 in its own corporate operations. However, it has not published data on its suppliers. [Loblaw - 2020 CSR Report, 2020: loblaw.ca] Not Met: Fatalities rate for lasting reporting period Not Met: Occupation disease rate for last reporting period <p>Score 2</p> <ul style="list-style-type: none"> Not Met: How working with suppliers on H&S Not Met: Assessment of the number affected by H&S issues in the SP Not Met: Provides analysis of trends demonstrating progress
D.1.8.b	Land rights: Land acquisition (in the supply chain)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Not Met: Rules on land & owners in codes or contracts Not Met: How working with suppliers on land issues <p>Score 2</p> <ul style="list-style-type: none"> Not Met: Includes resettlement requirements that the supplier provides financial compensation Not Met: Assessment of the number affected by land rights issues in its SP Not Met: Provides analysis of trends demonstrating progress
D.1.9.b	Water and sanitation (in the supply chain)	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Met: Rules on water stewardship in codes or contracts: Loblaw states in its Supplier Code of Conduct that suppliers should provide their workers with a safe and hygienic working environment. Suppliers should also provide sufficient potable drinking water at all times. [Loblaw - Supplier Code, 01/2022: loblaw.ca] Not Met: How working with suppliers on water stewardship issues <p>Score 2</p> <ul style="list-style-type: none"> Not Met: Assessment on the number affected by lack of access to water and sanitation Not Met: Provides analysis of trends demonstrating progress
D.1.10.b	Women's rights (in the supply chain)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Not Met: Women's rights in codes or contracts 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: Provides analysis of trends demonstrating progress

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
E(1).0	Serious allegation No 1		No allegations meeting the CHRB severity threshold were found, and so the score of 8.29 out of 80 points scored in themes A-D has been applied to produce a score of 2.07 out of 20 points for theme E.

Disclaimer

A score of zero for a particular indicator does not mean that bad practices are present. Rather it means that we have been unable to identify the required information in public documentation.

See the 2020 Key Findings report and the 2019 technical annex for more details of the research process.

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As WBA, we want to emphasise that the results will always be a proxy for good human rights management, and not an absolute measure of performance. This is because there are no fundamental units of measurement for human rights. Human rights assessments are therefore necessarily more subjective than objective. The Benchmark also captures only a snap shot in time. We therefore want to encourage companies, investors, civil society and governments to look at the broad performance bands that companies are ranked within rather than their precise score because, as with all measurements, there is a reasonably wide margin of error possible in interpretation. We also want to encourage a greater analytical focus on how scores improve over time rather than upon how a company compares to other companies in the same industry today. The spirit of the exercise is to promote continual improvement via an open assessment process and a common understanding of the importance of the UN Guiding Principles on Business and Human Rights.

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