

**Corporate Human Rights Benchmark  
2022 Company Scoresheet**

**Company Name** Hormel Foods  
**Industry** Agricultural Products (Supply Chain and Own Operations)  
**Overall Score** 12.9 out of 100

| Theme Score | Out of | For Theme   |
|-------------|--------|---|
| 2.0         | 10     | A. Governance and Policies                          |
| 0.7         | 25     | B. Embedding Respect and Human Rights Due Diligence |
| 4.0         | 20     | C. Remedies and Grievance Mechanisms                |
| 3.6         | 25     | D. Performance: Company Human Rights Practices      |
| 2.6         | 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  | 2                | The individual elements of the assessment are met or not as follows:<br>Score 1<br><ul style="list-style-type: none"> <li>Met: General HRs commitment: The Company states in its Code of Business Conduct that it 'is committed to promoting and protecting these basic rights [human rights] within our operations and in our supply chain. Any abuse of human rights will not be tolerate anywhere in our organization or within the operations of our business partners'. [Code of Ethical Business Conduct, 2021: <a href="https://www.hormelfoods.com">s25.q4cdn.com</a>]</li> </ul> Score 2<br><ul style="list-style-type: none"> <li>Met: Commitment to the UNGPs: The Company indicates on its website section 'Human Rights Statement': 'We also value and respect the international principles, guidelines and goals aimed at promoting and protecting human rights, including the: [...] Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises; [...]; U.N. Guiding Principles on Business and Human Rights; [...]'. [Human Rights Statement (web), N/A: <a href="https://www.hormelfoods.com">hormelfoods.com</a>]</li> <li>Met: Commitment to the OECD Guidelines for Multinational Enterprises: See above. [Human Rights Statement (web), N/A: <a href="https://www.hormelfoods.com">hormelfoods.com</a>]</li> </ul> |
| A.1.2.a        | Commitment to respect the human rights of workers: ILO Declaration on Fundamental Principles and Rights at Work | 0.5              | The individual elements of the assessment are met or not as follows:<br>Score 1<br><ul style="list-style-type: none"> <li>Not Met: Company has a commitment to the ILO Core: The Company indicates on its website section 'Human Rights Statement': 'We also value and respect the international principles, guidelines and goals aimed at promoting and protecting human rights, including the: [...] International Labour Organization Conventions'. However, no explicit commitment found to Fundamental ILO conventions. [Supplier Code of Conduct (web), N/A: <a href="https://www.hormelfoods.com">hormelfoods.com</a>]</li> <li>Not Met: Company has an explicit commitment to All four ILO Core: The Company stated in the corporate responsibility report that it 'adheres to the National Labour</li> </ul>   |

| Indicator Code | Indicator name   | Score (out of 2) | Explanation  |
|----------------|--|------------------|--|
|                |  |                  | <p>Relations Act and respects the rights of employees to choose whether or not they want to organise a collective bargaining unit'. However, this document is no longer considered a suitable source for policy statements according to CHRB's revised approach. The Code of conduct includes a commitment to respect human rights 'it includes following the laws prohibiting forced and compulsory labor, child labor, employment discrimination and human trafficking. The code also contains and equal opportunity commitment. No evidence found, however, of commitment to freedom of association and collective bargaining. [Corporate Responsibility Report, 2018: <a href="http://hormelfoods.com">hormelfoods.com</a>] &amp; [Suppliers Responsibility Principles, 2010: <a href="http://hormelfoods.com">hormelfoods.com</a>]</p> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Company expect suppliers to commit to ILO Core: In its Supplier Code, the Company indicates: 'Suppliers are expected to act in accordance with the international principles and guidelines aimed at promoting and protecting human rights, including [...], International Labour Organization Conventions and Declaration on Fundamental Principles and Rights at Work' [Supplier Code of Conduct (web), N/A: <a href="http://hormelfoods.com">hormelfoods.com</a>]</li> <li>• Met: Company explicitly list All four ILO for suppliers: In addition, its Suppliers Code includes provisions covering all ILO Core. With respect freedom of association and collective bargaining, it requires: 'Suppliers must respect the rights of employees to freedom of association and collective bargaining'. [Supplier Code of Conduct (web), N/A: <a href="http://hormelfoods.com">hormelfoods.com</a>] &amp; [Code of Ethical Business Conduct, N/A: <a href="http://s25.q4cdn.com">s25.q4cdn.com</a>]</li> </ul>   |
| A.1.2.b        | Commitment to respect the human rights of workers: Health and safety and working hours   | 0.5              | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Commitment to respect H&amp;S of workers: The Company states in its Code of Ethical Business Conduct: 'Nothing is more central to who we are than our commitment to the safety and health of our people, the quality of our products and the welfare of the animals in our care. To meet this commitment, we have adopted some of the highest safety, health and food safety/quality standards in our industry'. [Code of Ethical Business Conduct, 2021: <a href="http://s25.q4cdn.com">s25.q4cdn.com</a>]</li> <li>• Not Met: Respect ILO labour standards on working hours or Commits to 48 hours regular work week</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Expect suppliers to commit to H&amp;S of their workers: The Company states in its Supplier Code: 'Suppliers must provide safe and healthy working conditions and have appropriate controls, procedures and training in place.' In addition, it indicates in the Supplier Responsibility Principles that it 'supports a high standard for ensuring employee health and safety. Suppliers must be in compliance with applicable safety and health regulations, and applicable laws and regulations relating to working conditions. Suppliers should have appropriate controls, procedures and preventative training to ensure a safe work environment for employees.' [Supplier Code of Conduct (web), N/A: <a href="http://hormelfoods.com">hormelfoods.com</a>] &amp; [Suppliers Responsibility Principles, 2010: <a href="http://hormelfoods.com">hormelfoods.com</a>]</li> <li>• Not Met: Expect suppliers to commit to ILO labour standard or to 48 hours regular work week: The Company indicates in its Supplier Code: 'Suppliers must meet or exceed all legal requirements for compensation, working hours, time off ,rest periods, benefits and working conditions.' However, no formal commitment about respecting the ILO conventions on working hours was found. Alternatively, the Company would achieve this by committing to a 48 hours regular working week, and consensual overtime paid at a premium rate. [Supplier Code of Conduct (web), N/A: <a href="http://hormelfoods.com">hormelfoods.com</a>]</li> </ul> |
| 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"> <li>• Not Met: Respect land ownership and natural resources as set out in VGGT</li> <li>• Not Met: Respect land ownership and natural resources as set out in The IFC Performance Standards</li> <li>• Not Met: Respecting indigenous peoples' rights or ILO Convention No.169 or UN Declaration</li> <li>• Not Met: Expecting suppliers to make these commitments</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Respecting the right to water</li> <li>• Not Met: Company's policy commits to obtain FPIC: In its Supplier Code the Company requires to 'all suppliers to legally acquire land rights and take measures to ensure the protection of high conservation value areas, high carbon stock forests, rainforests and peatlands (regardless of depth). However, no reference to FPIC was found. [Supplier Code of Conduct (web), N/A: <a href="http://hormelfoods.com">hormelfoods.com</a>]</li> <li>• Not Met: Expecting suppliers to make these commitments</li> </ul>  |

| Indicator Code | Indicator name  | Score (out of 2) | Explanation  |
|----------------|---|------------------|--|
| A.1.3.b.AG     | Commitment to respect human rights particularly relevant to the industry – vulnerable groups (AG) | 0.5              | The individual elements of the assessment are met or not as follows:<br>Score 1<br><ul style="list-style-type: none"> <li>• Met: Women's rights: The Company indicates in its Human Rights Statement: 'We are committed to treating people with the utmost dignity and respect throughout our entire supply chain, and promoting and protecting the rights of all workers, including at-risk populations such as minors, women and minorities'. [Human Rights Statement (web), N/A: <a href="http://hormelfoods.com">hormelfoods.com</a>]</li> <li>• Not Met: Expects suppliers to respect at least one of these rights: The Company has provided comments to CHRB regarding this indicator. However, the evidence has not been found in publicly available sources. [Supplier Code of Conduct (web), N/A: <a href="http://hormelfoods.com">hormelfoods.com</a>]</li> </ul> Score 2<br><ul style="list-style-type: none"> <li>• Not Met: CEDAW/Women's Empowerment Principles</li> <li>• Not Met: Child Rights Convention/Business Principles</li> <li>• Not Met: Convention on migrant workers</li> <li>• Not Met: Expecting suppliers to respect these rights</li> </ul> |
| A.1.4          | Commitment to remedy  | 0                | The individual elements of the assessment are met or not as follows:<br>Score 1<br><ul style="list-style-type: none"> <li>• Not Met: The Company commits to remedy: Although the Company reports about the existence of grievance mechanisms, no statement committing to remedy the adverse impacts on individuals and workers and communities that it has caused or contributed to was found. [Code of Ethical Business Conduct, N/A: <a href="http://s25.q4cdn.com">s25.q4cdn.com</a>]</li> <li>• Not Met: Company expect suppliers to make this commitment: Although the Company requires its suppliers to put in place grievance mechanisms, no provision requiring its suppliers to commit to remedy the adverse impacts on individuals and workers and communities that it has caused or contributed to was found. [Supplier Code of Conduct (web), N/A: <a href="http://hormelfoods.com">hormelfoods.com</a>]</li> </ul> Score 2<br><ul style="list-style-type: none"> <li>• Not Met: Collaborating with other remedy initiatives</li> <li>• Not Met: Work with suppliers to remedy impact</li> </ul>   |
| A.1.5          | Commitment to respect the rights of human rights defenders  | 0                | The individual elements of the assessment are met or not as follows:<br>Score 1<br><ul style="list-style-type: none"> <li>• Not Met: Zero tolerance attacks on HRs Defenders (HRDs): Although the Company states in its Code of Conduct that it 'will not tolerate retaliation of any kind that targets someone for reporting misconduct in good faith or for cooperating with an internal investigation.', no reference to human rights defenders was found. [Code of Ethical Business Conduct, N/A: <a href="http://s25.q4cdn.com">s25.q4cdn.com</a>]</li> <li>• Not Met: Company expect suppliers to make this commitment</li> </ul> Score 2<br><ul style="list-style-type: none"> <li>• Not Met: Work with HRD to create safe and enabling environment</li> </ul>  |

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

| Indicator Code | Indicator name          | Score (out of 2) | Explanation  |
|----------------|-------------------------|------------------|--|
| A.2.1          | Commitment from the top | 0.5              | The individual elements of the assessment are met or not as follows:<br>Score 1<br><ul style="list-style-type: none"> <li>• Met: Board level responsibility for HRs: The Company states that 'to ensure adherence to our Code of Ethical Business Conduct and Supplier Code of Conduct, we established a compliance program that upholds accountability through reporting, tracking and investigating possible violations. The Audit Committee of the company's Board of Directors oversees the compliance program.' It code of Ethical Business Conduct includes human rights issues. [Website, Human Rights, N/A: <a href="http://csr.hormelfoods.com">csr.hormelfoods.com</a>]</li> <li>• Not Met: Describe HR expertise of Board member: The Company discloses information about its Board Directors expertise in its Proxy Statement 2021, however no human rights expertise information was found. [Proxy statement 2021, 2022: <a href="http://s25.q4cdn.com">s25.q4cdn.com</a>]</li> </ul> Score 2<br><ul style="list-style-type: none"> <li>• Not Met: Speeches/letters by Board members or CEO: The Company has provided comments to CHRB regarding this indicator. However, evidence was not material. No Board members or the CEO speech or message was found where a clearly signal of company's commitment to human rights discussing why human rights matter to the business or any challenges to respecting human rights encountered by the business was found.</li> </ul> |
| A.2.2          | Board responsibility    | 0                | The individual elements of the assessment are met or not as follows:<br>Score 1<br><ul style="list-style-type: none"> <li>• Not Met: Board/Committee review HRs strategy: The Company states that the Hormel Foods Corporate Responsibility (CR) Steering Committee is comprised of</li> </ul>   |

| Indicator Code | Indicator name                        | Score (out of 2) | Explanation   |
|----------------|---------------------------------------|------------------|---|
|                |                                       |                  | <p>company executives. The group's role is to provide direction and approval for the company's environmental, social and governance activities. The chair of the committee reports directly to chief executive officer. However, this does not seem to be a Supervisory Board committee. In addition, the Governance Committee of Board of Directors has oversight of all of corporate responsibility activities. However, it is not clear whether human right issues are also included. The Company has provided comments to CHRB regarding this indicator. However, this information has not been found in publicly available sources. [Corporate Responsibility 2020 CR Report, 25/10/2020: <a href="https://www.hormelfoods.com/csr">csr.hormelfoods.com</a>] &amp; [Financials - website, N/A: <a href="https://www.hormelfoods.com">csr.hormelfoods.com</a>]</p> <ul style="list-style-type: none"> <li>• Not Met: Examples/trends re HR discussion in the last reporting period</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Meets both requirements under score 1</li> <li>• Not Met: How affected stakeholders/HR experts informed discussions</li> </ul> |
| A.2.3          | Incentives and performance management | 0                | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Incentives for at least one board member: The Company discloses information about compensation for its board of directors in its Proxy Statement 2021. However, no incentive mechanism that links human rights performance was found. [Proxy statement 2021, 2022: <a href="https://www.hormelfoods.com/s25.q4cdn.com">s25.q4cdn.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: At least one key HR risk, beyond employee H&amp;S</li> <li>• Not Met: Performance criteria made public</li> <li>• Not Met: Review of other board performance criteria</li> </ul>   |
| A.2.4          | Business model strategy and risks     | 0                | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Board process to review bussiness model and strategy: The Company has provided additional comment/source to CHRB regarding this indicator. However, evidence was not material. No evidence describing the process(es) it has in place to discuss and review its business model and strategy for inherent risks to human rights at board level or a board committee was found. [Corporate Governance Guidelines, 09/2022: <a href="https://www.hormelfoods.com/s25.q4cdn.com">s25.q4cdn.com</a>] &amp; [Proxy statement 2021, 2022: <a href="https://www.hormelfoods.com/s25.q4cdn.com">s25.q4cdn.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Describe frequency and triggers for reviewing</li> <li>• Not Met: Meets both requirements under score 1</li> <li>• Not Met: Example of actions decided</li> </ul>  |

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

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

| Indicator Code | Indicator name   | Score (out of 2) | Explanation   |
|----------------|--|------------------|---|
| B.1.1          | Responsibility and resources for day-to-day human rights functions | 0                | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Score of 1 on A.1.2.a</li> <li>• Not Met: Senior responsibility for HR implementation and decision making: The Company indicates on its website that its Human Rights Statement is 'reviewed annually by the senior vice president of human resources.' However, no further information regarding senior manager role(s) accountable for implementation and decision making on human rights issues within the company. [Website, Human Right Statement, N/A: <a href="https://www.hormelfoods.com">hormelfoods.com</a>]</li> </ul> |

| Indicator Code | Indicator name  | Score (out of 2) | Explanation  |
|----------------|---|------------------|--|
|                |   |                  | <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: How it assigns Day-to-day responsibility: Hormel Foods discloses that 'recognize that our sustainability practices directly align with our financial goals and thus, sustainability serves as a guide to our day-to-day business operations. In this way, we excel as a company and improve our sustainability performance while adhering to the highest standards of ethics. The Board of Directors oversees all activities at Hormel Foods and assumes the ultimate responsibility of ensuring that the company's performance is based on strong ethical practices and is aligned with the Code of Ethical Business Conduct. In calendar year 2015, Hormel Foods implemented a Corporate Responsibility (CR) Steering Committee. The CR Steering Committee is comprised of company executives, and the group's role is to provide direction and approval for the company's environmental, social and governance activities. Our CR Council (comprised of cross-functional subject-matter experts) reports to the CR Steering Committee. In addition, oversight of our sustainability, environmental and corporate social responsibility activities was formally added to the responsibility of the Governance Committee of our Board of Directors'. However, there is no description about how day-to-day responsibility is allocated across the range of relevant functions of the Company. Also it is not clear if human rights is included on sustainability. [Website, Governance, 2020: <a href="http://csr.hormelfoods.com">csr.hormelfoods.com</a>]</li> <li>• Not Met: Day-to-day resources and expertise allocation in own ops</li> <li>• Not Met: Resources and expertise allocation in the supply chain</li> </ul> |
| B.1.2          | Incentives and performance management   | 0                | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Senior manager incentives for human rights: The Company indicates in its Annual Report 2021: 'Senior leaders of the Company are held accountable to creating an inclusive, diverse workplace through the annual incentive plan, a component of which focuses on overall belonging scores and the representation of women and underrepresented minorities in salaried positions.' However, inclusivity and diversity of the workplace is only one aspect of the human rights responsibilities of the company. The company does not disclose whether it is limiting the incentives to this particular aspect of human rights performance. [Annual Report 2021, 2022: <a href="http://s25.q4cdn.com">s25.q4cdn.com</a>]</li> <li>• Not Met: At least one key HR risk, beyond employee H&amp;S</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Performance criteria made public</li> <li>• Not Met: Review of other senior management performance</li> </ul>  |
| B.1.3          | Integration with enterprise risk management   | 0                | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: HR risks is integrated as part of enterprise risk system: The Company reports that supported by the board, the enterprise risk management (ERM) initiative at Hormel Foods aims to examine and manage potential risks to the company. ERM risk teams meet throughout the year to identify, measure and mitigate key risks across the company. ERM teams continually reassess risks to document changes to risk exposures, look for new and emerging risks, and provide regular updates to senior management. However, details of its enterprise risk management system cannot be found. It is not clear whether human right risk is integrated as part of its ERM. On the other hand, the Company discloses information about its Risks Factors in its Annual Report 2021. However, no risk related to human rights was found. [Corporate Responsibility 2020 CR Report, 25/10/2020: <a href="http://csr.hormelfoods.com">csr.hormelfoods.com</a>] &amp; [Annual Report 2021, 2022: <a href="http://s25.q4cdn.com">s25.q4cdn.com</a>]</li> <li>• Not Met: Provides an example</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Audit Ctte or independent risk assessment</li> </ul>  |
| B.1.4.a        | Communication /dissemination of policy commitment(s) to workers and external stakeholders | 0                | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Score of 1 on A.1.2.a: See A.1.2.a</li> <li>• Not Met: Communicates its policy to all workers in own operations: The Company states that it provides the Code of Ethical Business Conduct and third-party compliance reporting process for all employees globally and communicates its values platform to employees in their native languages. And although the Company publishes all its policies in its corporate sites, no proactive communication activities were found. No evidence found on how the communication is made and includes human-rights related policies. The Company has provided comments to CHRB regarding this indicator. However, some information has not been found in publicly available sources. [Website, Ethics, Governance and Risk, N/A: <a href="http://hormelfoods.com">hormelfoods.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Communication of policy commitments to stakeholder</li> </ul>   |

| Indicator Code | Indicator name   | Score (out of 2) | Explanation  |
|----------------|--|------------------|--|
| B.1.4.b        | Communication /dissemination of policy commitment(s) to business relationships | 0                | <ul style="list-style-type: none"> <li>• Not Met: How policy commitments are made accessible to audience</li> </ul> <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Meets ILO requirement for suppliers on A.1.2.a: See indicator A.1.2.a</li> <li>• Not Met: Steps to communicate policy commitments to supply chain: The Company states that it has Supplier Code of Conduct, which includes human rights requirements. It also reports that 'we introduced these requirements to our key suppliers in fiscal year 2011. We then shared them with all of our suppliers in 2015 to ensure everyone is operating in a sustainable and responsible manner. We continue to review and update these requirements on an ongoing basis to ensure that top sustainability concerns are addressed and that they are ingrained in all levels of our business'. The Supplier Code indicates: 'Our Supplier Code of Conduct outlines our expectations for all suppliers. Hormel Foods expects all suppliers to be able to demonstrate compliance with this code upon our request and to take action to correct any noncompliance. [...] For the purpose of this document, "supplier" means any company, corporation or other entity that sells or seeks to sell goods or services to Hormel Foods, as well as their suppliers and sub-contractors.' However, details of steps it takes to communicate its human rights policy to suppliers and their supply chain was not found (or how it requires suppliers to communicate policies down the supply chain). [Website, Supply Chain, N/A: <a href="http://hormelfoods.com">hormelfoods.com</a>] &amp; [Supplier Code of Conduct (web), N/A: <a href="http://hormelfoods.com">hormelfoods.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Requires suppliers to communicate policy requirements</li> <li>• Not Met: How HR commitments made binding/contractual</li> <li>• Not Met: Company requires suppliers to cascade down to their suppliers</li> </ul>   |
| B.1.5          | Training on Human Rights   | 0.5              | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Scores at least 1 on A.1.2.a: See indicator A.1.2.a</li> <li>• Met: How workers are trained on HR policy commitments: The Company reports that 'Hormel Foods team members are trained on policies and procedures concerning aspects of human rights that are relevant to our operations. In 2020, around 3,800 hours were dedicated to human rights training.' [Corporate Responsibility 2020 CR Report, 25/10/2020: <a href="http://csr.hormelfoods.com">csr.hormelfoods.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Trains relevant managers including procurement</li> <li>• Not Met: Score of 2 on A.1.2.a</li> <li>• Not Met: Meets both requirements under score 1</li> <li>• Not Met: Trains suppliers to meet company's HR commitment</li> <li>• Not Met: Disclose % trained</li> </ul>  |
| B.1.6          | Monitoring and corrective actions  | 0                | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Scores at least 1 on A.1.2.a: See indicator A.1.2.a</li> <li>• Not Met: Monitoring implementation of HR policy commitments across global ops and supply chain: The Company states that through its supplier quality management programme, it formally assesses key suppliers in the areas of service, quality and sustainability. Based on the results from this assessment process, it will work with the suppliers in the categories in which opportunities for improvement have been identified. In addition, it indicates in its Supplier Code (which includes human rights requirements): 'Hormel Foods will verify compliance with the Supplier Code of Conduct through the following ways: Suppliers must be able to demonstrate compliance with our Supplier Code of Conduct upon our request; Through audits following a reasonable request, with the expectation that suppliers will correct any identified deficiencies in a timely manner; Through the investigation of any reported concerns; If requested, suppliers are required to complete a sustainability assessment survey to demonstrate compliance and develop a baseline of sustainability performance and potential improvements.' However, no information describing monitoring for own operations was found. The Company provided feedback to CHRB regarding this indicator, but the supporting document is not public/to be published. [Website, Supply Chain, N/A: <a href="http://hormelfoods.com">hormelfoods.com</a>] &amp; [Supplier Code of Conduct (web), N/A: <a href="http://hormelfoods.com">hormelfoods.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Proportion of supply chain monitored</li> <li>• Not Met: Describe how workers are involved in monitoring</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Score of 2 on A.1.2.a: See indicator A.1.2.a</li> <li>• Not Met: Describes corrective action process: As indicated above, the Company states in its Supplier Code: 'Hormel Foods will verify compliance with the Supplier Code of Conduct through the following ways: [...] Through audits following a reasonable request, with the expectation that suppliers will correct any identified</li> </ul> |

| Indicator Code | Indicator name                                    | Score (out of 2) | Explanation  |
|----------------|---|------------------|--|
|                |   |                  | deficiencies in a timely manner.' However, no further information describing the corrective action process was found. [Supplier Code of Conduct (web), N/A: <a href="http://hormelfoods.com">hormelfoods.com</a> ]<br><ul style="list-style-type: none"> <li>• Not Met: Disclose findings and number of corrective action</li> </ul>   |
| B.1.7          | Engaging and terminating business relationships   | 0.5              | The individual elements of the assessment are met or not as follows:<br>Score 1<br><ul style="list-style-type: none"> <li>• Not Met: HR affects selection of suppliers</li> <li>• Met: HR affects on-going supplier relationships: The Company states that it expects suppliers to act in accordance with the internal principles and guidelines aimed at promoting and protecting human rights, including the International Bill of Human Rights, International Labour Organization Conventions and Declaration on Fundamental Principles and Rights at Work, OECD Guidelines for Multinational Enterprises, UN Declaration of Human Rights, UN Global Compact's 10 Principles and the UN Guiding Principles on Business and Human Rights. This document outlines the principles Hormel Foods is committed to and expectations for all suppliers. Hormel Foods will suspend or discontinue purchases from a supplier if an audit or other creditable source reveals they are violating these requirements. [Suppliers Responsibility Principles, N/A: <a href="http://hormelfoods.com">hormelfoods.com</a>]</li> </ul> Score 2<br><ul style="list-style-type: none"> <li>• Not Met: Describe positive incentives offered to respect human rights: The Company states that through its supplier quality management programme, it formally assesses key suppliers in the areas of service, quality and sustainability. In 2020, it awarded 65 Spirit of Excellence Awards to suppliers that exceeded its standards. No details found, however, on whether it offers positive incentives to suppliers who show good HR performance. [Website, Supply Chain, N/A: <a href="http://hormelfoods.com">hormelfoods.com</a>]</li> <li>• Not Met: Working with suppliers to meet HR requirements</li> </ul>       |
| B.1.8          | Approach to engagement with affected stakeholders | 0                | The individual elements of the assessment are met or not as follows:<br>Score 1<br><ul style="list-style-type: none"> <li>• Not Met: Stakeholder process or systems to identify and engage with workers/communities in the last two years: The Company indicates on its website section 'Stakeholder feedback': 'we conducted a process to identify topics based on the interest of our stakeholders — a group that includes employees, customers, consumers, investors, suppliers, nongovernmental organizations, government agencies and communities. The analysis included interviews, socially responsible investor (SRI) inquiries/questionnaires, customer questionnaires, consumer feedback, meetings, conferences and media coverage.' However, no information describing how it identifies affected stakeholders was found. [Stakeholder feedback, N/A: <a href="http://csr.hormelfoods.com">csr.hormelfoods.com</a>]</li> <li>• Not Met: Discloses stakeholders that HRs may be affected</li> <li>• Not Met: Provides two examples of engagement with stakeholders: In addition, the Company discloses information about its engagement activities with each group, including: Employees - 'Engagement surveys'; Communities - 'Representation and participation in community organizations'. However, no further information was found describing examples of engagement with stakeholders whose human rights have been or may be affected by its activities in the last two years. [Stakeholder feedback, N/A: <a href="http://csr.hormelfoods.com">csr.hormelfoods.com</a>]</li> </ul> Score 2<br><ul style="list-style-type: none"> <li>• Not Met: Analysis of stakeholder views on company's HR issues</li> <li>• Not Met: Describe how views influenced company's HR approach</li> </ul> |

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

| Indicator Code | Indicator name                             | Score (out of 2) | Explanation   |
|----------------|--|------------------|---|
| B.2.1          | Identifying human rights risks and impacts | 0                | The individual elements of the assessment are met or not as follows:<br>Score 1<br><ul style="list-style-type: none"> <li>• Not Met: Identifying risks in own operations: The Company discloses that 'ERM risk teams meet throughout the year to identify, measure and mitigate key risks across the company. ERM teams continually reassess risks to document changes to risk exposures, look for new and emerging risks, and provide regular updates to senior management'. The Company also states in its Corporate Responsibility Report that it does not have any operations in which the right to exercise freedom of association and collective bargaining is at significant risk. However, no description found the process to identify its human rights risks and impacts in specific locations or activities as part of an on-going due diligence process. The Company indicates that will provide additional information in future reports. [Website, Ethics, Governance and Risk, N/A: <a href="http://hormelfoods.com">hormelfoods.com</a>] &amp; [Corporate Responsibility 2020 CR Report, 25/10/2020: <a href="http://csr.hormelfoods.com">csr.hormelfoods.com</a>]</li> </ul> |

| Indicator Code | Indicator name   | Score (out of 2) | Explanation  |
|----------------|--|------------------|--|
|                |  |                  | <ul style="list-style-type: none"> <li>• Not Met: Identifying risks through relevant business relationships: The Company states that it is continually looking for ways to assess current supplier relationships to ensure that environmental/social risks are addressed. It meets with top suppliers annually to evaluate their initiatives and collaborate on projects to address key issues such as environmental and social risks. It also reports internal results through a third party for its customers. However, no description found of the process to identify which are the potential risks and impacts related to human rights that it faces through its supply chain. [Corporate Responsibility 2020 CR Report, 25/10/2020: <a href="http://csr.hormelfoods.com">csr.hormelfoods.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Describe ongoing global risk identification in consultation with stakeholder/HR experts: Although the Company engages with different stakeholders, no information of such an engagement as part of a due diligence process to identify human rights issues was found. [Stakeholder feedback, N/A: <a href="http://csr.hormelfoods.com">csr.hormelfoods.com</a>]</li> <li>• Not Met: Triggered by new circumstances</li> <li>• Not Met: Describes risks identified</li> </ul>   |
| B.2.2          | Assessing human rights risks and impacts   | 0                | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Describe process for assessment of HR risks and discloses salient HR issues: The Company describes that 'To inform our reporting and corporate responsibility objectives, Hormel Foods engaged with BSR in 2017, a non-profit sustainability consultancy and business network, to help us identify, prioritize and understand the topics most relevant to our business and our stakeholders. Topics were identified based on our prior assessment, industry trends and global corporate responsibility megatrends. The topics were then prioritized based on input from senior executives, our Corporate Responsibility Council and key external stakeholders, whom offer a broad and diverse perspective on Hormel Foods. We engaged senior executives representing key business functions and members of our Corporate Responsibility Council to validate our assessment and key topics'. The Company also states that it next full key topics assessment process would be conducted in 2021. However, the result of assessment is not publicly available yet. Nonetheless no description found about its process(es) for assessing the saliency of potential human rights risks and impacts. The Company provided feedback to CHRB regarding this indicator, but the supporting document is still not public. [Website, Key topic assessment: <a href="http://csr.hormelfoods.com">csr.hormelfoods.com</a>]</li> <li>• Not Met: How process applies to supply chain</li> <li>• Not Met: Public disclosure of the results of HR assessment: No evidence found of the specific human rights issues that the Company considers salient. [Website, Key topic assessment: <a href="http://csr.hormelfoods.com">csr.hormelfoods.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Meets all requirements under score 1</li> <li>• Not Met: How it involved affected stakeholders in the assessment</li> </ul> |
| B.2.3          | Integrating and acting on human rights risks and impact assessments                | 0                | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Action Plans to mitigate risks: The Company informs that use a third party to help research, analyse and assess the key topics affecting Hormel Foods and the food industry. However, no evidence found of a description about a global system to take action to prevent, mitigate or remediate its salient human rights issues. [Corporate Responsibility 2020 CR Report, 25/10/2020: <a href="http://csr.hormelfoods.com">csr.hormelfoods.com</a>]</li> <li>• Not Met: Description of how global system applies to supply chain</li> <li>• Not Met: Example of actions decided on at least 1 salient HR issues</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Meets all requirements under score 1</li> <li>• Not Met: Involve stakeholders in decisions about actions</li> </ul>  |
| B.2.4          | Tracking the effectiveness of actions to respond to human rights risks and impacts | 0                | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: System for tracking or monitor if actions taken are effective: The Company has provided comments to CHRB regarding this indicator. However, evidence was not material. No description was found of a system for tracking or monitoring the actions taken in response to human rights risks identified and assessed in the due diligence process and for evaluating whether the actions taken have been effective or have missed key issues or not produced the desired results.</li> <li>• Not Met: Lessons learnt from checking system effectiveness</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Meets both requirements under score 1</li> <li>• Not Met: Involve stakeholders in evaluation of actions taken</li> </ul>  |



| Indicator Code | Indicator name                        | Score (out of 2) | Explanation   |
|----------------|---------------------------------------|------------------|---|
| B.2.5          | Communicating on human rights impacts | 0                | The individual elements of the assessment are met or not as follows:<br>Score 1<br><ul style="list-style-type: none"> <li>• Not Met: Provides two examples of comms with stakeholders: The Company has provided comments to CHRB regarding this indicator. However, evidence was not material. No evidence was found describing how it communicates with affected stakeholders regarding specific human rights impacts raised by them or on their behalf.</li> </ul> Score 2<br><ul style="list-style-type: none"> <li>• Not Met: Describe challenges to effective comms and how it is working to address them</li> </ul> |

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

| Indicator Code | Indicator name  | Score (out of 2) | Explanation   |
|----------------|---|------------------|---|
| C.1            | Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers                              | 1.5              | The individual elements of the assessment are met or not as follows:<br>Score 1<br><ul style="list-style-type: none"> <li>• Met: Channel accessible to all workers: The Company discloses that provides a hotline number and a specific website operated by an independent third-party organization to facilitate anonymous employee feedback and concerns, in which any worker can make complaints. Both mechanisms can be used to report a range of issues, including corruption and discrimination. [Website, Ethics, Governance and Risk, N/A: <a href="http://hormelfoods.com">hormelfoods.com</a>] &amp; [Code of Ethical Business Conduct, 2021: <a href="http://s25.q4cdn.com">s25.q4cdn.com</a>]</li> </ul> Score 2<br><ul style="list-style-type: none"> <li>• Not Met: Channel is available in all appropriate languages and workers aware: The Company states that it provides many resources reporters can choose from contact supervisor, another manager, Legal, Human Resources or the Ethics and Compliance team, or use the anonymous website. Reporters can dial the Ethics and Compliance Hotline in each country. It also states that 'when you dial your country access code, you will be asked for the U.S. Hotline number. Then you will be connected to a native-language Communication Specialist.' Although, information about the grievance channel is included in the Code of Conduct (translated to 15 languages), no further information was found describing proactive actions to ensure workers are aware of the existence and functioning of the grievance mechanism. [Code of Ethical Business Conduct, 2021: <a href="http://s25.q4cdn.com">s25.q4cdn.com</a>]</li> <li>• Met: Describe how workers in the supply chain have access to grievance mechanism: The Company indicates in its Supplier Code: 'Suppliers must provide options for employees to report concerns without fear of retaliation'. [Supplier Code of Conduct (web), N/A: <a href="http://hormelfoods.com">hormelfoods.com</a>]</li> <li>• Met: Expect Suppliers to convey expectation to their own suppliers: In addition, its Supplier Code reads: 'For the purpose of this document, "supplier" means any company, corporation or other entity that sells or seeks to sell goods or services to Hormel Foods, as well as their suppliers and sub-contractors.' [Supplier Code of Conduct (web), N/A: <a href="http://hormelfoods.com">hormelfoods.com</a>]</li> </ul> |
| C.2            | Grievance channel(s)/mechanism(s) to receive complaints or concerns from external individuals and communities | 1                | The individual elements of the assessment are met or not as follows:<br>Score 1<br><ul style="list-style-type: none"> <li>• Met: Grievance mechanism for community: The website operated by a third party that the Company provides is accessible to anyone who wants to make a complaint. [Code of Ethical Business Conduct, N/A: <a href="http://s25.q4cdn.com">s25.q4cdn.com</a>] &amp; [Hormel Foods Alert Line, N/A: <a href="http://secure.ethicspoint.com">secure.ethicspoint.com</a>]</li> </ul> Score 2<br><ul style="list-style-type: none"> <li>• Not Met: Describes accessibility and local languages and stakeholder awareness: The Company provided feedback to this datapoint, but no information found on the Company's Code of Conduct in regards to accessibility of the grievance channel on local languages and how this is informed to stakeholders. [Code of Ethical Business Conduct, N/A: <a href="http://s25.q4cdn.com">s25.q4cdn.com</a>]</li> <li>• Not Met: Communities access mechanism direct or through suppliers: as above. Updated followed company feedback. It is not clear how communities have access to grievance mechanism.</li> <li>• Not Met: Expect supplier to convey expectation to their own suppliers: Supplier Code applies also to suppliers' supply chain, however, no requirement to establish a grievance mechanism for suppliers' suppliers external stakeholders (communities) was found. [Supplier Code of Conduct (web), N/A: <a href="http://hormelfoods.com">hormelfoods.com</a>]</li> </ul>   |
| C.3            | Users are involved in the design and performance of   | 0                | The individual elements of the assessment are met or not as follows:<br>Score 1<br><ul style="list-style-type: none"> <li>• Not Met: Engages users to create or assess system: The Company has provided comments to CHRB regarding this indicator. However, evidence was not material.</li> </ul>   |

| Indicator Code | Indicator name  | Score (out of 2) | Explanation  |
|----------------|---|------------------|--|
|                | the channel(s)/mechanism(s)   |                  | <p>No description of how it engages with potential or actual users on the design and performance of the mechanism(s) was found.</p> <ul style="list-style-type: none"> <li>• Not Met: Examples (at least two) of how they do this</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Engages with potential or actual users on the improvement of the mechanism</li> <li>• Not Met: Provides user engagement example (at least two) on improvement</li> </ul>   |
| C.4            | Procedures related to the mechanism(s)/channel(s) are equitable, publicly available and explained | 0                | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Response timescales and how complainants will be informed: The Company has reported the procedures for managing complaints or concerns. The procedure includes six steps such as create a report of concern, information will be kept as confidential as possible, investigation will be conducted if necessary, check back the status of report, and take appropriate action. In addition, on its Ethics Point website, when filing a complaint, it indicates: 'Please allow 10 business days for status update, however you can provide additional information at any time. We ask you to use this Report Key along with the password of your choosing to return to EthicsPoint through the website or telephone hotline in 10 business days. By returning in 10 business days, you will have the opportunity to review any follow-up questions or submit more information about this incident.' However, no further information about timescales for addressing complaints. and informing the complainant. [Code of Ethical Business Conduct, N/A: <a href="https://s25.q4cdn.com">s25.q4cdn.com</a>] &amp; [Report a concern - Ethics Point, N/A: <a href="https://secure.ethicspoint.com">secure.ethicspoint.com</a>]</li> <li>• Not Met: Describe support (technical, financial, etc) available for equal access by complainants</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Describe types of outcome to complainant through use of mechanism: The Company states that 'if your report is proven true, the Company will take appropriate action. You will be notified that the issue was resolved, but the outcome may be kept confidential. If it is not verified, you will also be notified.' However, it has not provided the types of outcomes to the complainants. The Company has provided comments to CHRB regarding this indicator. However, this document or its content has not been found in publicly available sources. [Code of Ethical Business Conduct, N/A: <a href="https://s25.q4cdn.com">s25.q4cdn.com</a>]</li> <li>• Not Met: Escalation to senior/independent level</li> </ul> |
| C.5            | Prohibition of retaliation for raising complaints or concerns                                     | 1                | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Public statement prohibiting retaliation: The Company states in its Ethical Code of Conduct that 'the Company will not tolerate retaliation of any kind that targets someone for reporting misconduct in good faith or for cooperating with an internal investigation.' [Code of Ethical Business Conduct, N/A: <a href="https://s25.q4cdn.com">s25.q4cdn.com</a>]</li> <li>• Met: Practical measures to prevent retaliation: The grievance mechanisms are operated by a third party organization and all feedbacks and concerns can be made anonymously. [Code of Ethical Business Conduct, N/A: <a href="https://s25.q4cdn.com">s25.q4cdn.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Company indicate it will not retaliate against workers/stakeholders</li> <li>• Not Met: Expects suppliers to prohibit retaliation against workers/stakeholders: Company's Supplier Code reads: 'In addition to our Supplier Code of Conduct, suppliers are required to follow any additional applicable company standards and policies. Links to additional policies can be found below: [...] Hormel Foods Code of Ethical Business Conduct'. As indicated above, the Code of Conduct includes a no retaliation provision. However, it is not clear if there are grievance mechanisms available for suppliers' external stakeholders (communities) was found. [Supplier Code of Conduct (web), N/A: <a href="https://hormelfoods.com">hormelfoods.com</a>] &amp; [Code of Ethical Business Conduct, N/A: <a href="https://s25.q4cdn.com">s25.q4cdn.com</a>]</li> </ul>  |
| C.6            | Company involvement with state-based judicial and non-judicial grievance mechanisms               | 0                | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Complainants not asked to waive rights</li> <li>• Not Met: Company does not require confidentiality provisions: The Company has provided comments to CHRB regarding this indicator. However, evidence was not material. No evidence showing that the company does not require confidentiality provisions (e.g., non-disclosure agreements) with respect to human rights grievances was found.</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Will work with state based non judicial mechanisms</li> <li>• Not Met: Example of issue resolved (if applicable)</li> </ul>   |

| Indicator Code | Indicator name   | Score (out of 2) | Explanation   |
|----------------|--|------------------|---|
| C.7            | Remedying adverse impacts  | 0                | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Describes how remedy has been provided: The Company describes the process after people speaks up through the hotline and states that 'all information will be kept as confidential as possible, including your identity. Only necessary Company staff will review the matter and decide next steps. Sometimes your name may need to be shared, such as with an investigator; however, we do not notify your leadership of your report. We do encourage you to provide your name as it will help facilitate the investigation. An investigation will be conducted if necessary. You and others may be interviewed. It is important to cooperate with the investigator. Check back occasionally to find out the status of your report. If you reported anonymously, the investigation may be delayed if you do not check the status of your report. There may be a posted request waiting for you to provide more information before an investigation can proceed.' However, no information on how the company provide remedy for a specific adverse human rights impact that it has caused or to which it has contributed. The Company has provided comments to CHRB regarding this indicator. However, evidence was not material. [Code of Ethical Business Conduct, N/A: <a href="https://www.hormelfoods.com/s25.q4cdn.com">s25.q4cdn.com</a>]</li> <li>• Not Met: Says how it would provide remedy for victims if no adverse impact identified</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Changes to systems, processes and practices to stop similar impact</li> <li>• Not Met: Describe approach to monitoring implementation of agreed remedy</li> <li>• Not Met: Approach to learning from incident to prevent future impacts</li> </ul> |
| C.8            | Communication on the effectiveness of grievance mechanism(s) and incorporating lessons learned | 0.5              | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Number grievances filed, addressed or resolved and outcome achieved: The Company reports that in 2020 there were no human rights incidents determined to be violations of its Code of Ethical Business Conduct or Supplier Code of Conduct. [Website, Human Rights, N/A: <a href="https://www.hormelfoods.com/csr.hormelfoods.com">csr.hormelfoods.com</a>]</li> <li>• Not Met: How lessons from mechanism improve management system</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Evaluation of the channel/mechanism and changes made as result</li> <li>• Not Met: Describes procedures to address delays of outcomes agreed with stakeholders</li> </ul>   |

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

| Indicator Code | Indicator name  | Score (out of 2) | Explanation  |
|----------------|---|------------------|--|
| D.1.1.a        | Living wage (in own production or manufacturing operations) | 0.5              | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Pays living wage or sets target date: The Company indicates on its website: 'Our goal is to attract, retain, motivate and reward high-performing individuals. We strive to be the employer of choice in all areas where we have locations by providing a fair living wage and comprehensive benefits package to meet the needs of team members and their families. We follow all established minimum wage requirements; however, minimum wages are generally not relevant as most of our entry-level positions at our office locations and production facilities require a higher level of skills or knowledge than jobs in which the minimum wage would apply. We review compensation at least annually to ensure it is equitable. We offer merit-based pay increases based on a formal performance management process and use a well-established process that is blind to race, gender, ethnicity or ability for determining related pay changes.' [People - benefits, N/A: <a href="https://www.hormelfoods.com">hormelfoods.com</a>]</li> <li>• Not Met: Describes how living wage determined</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Achieved paying a living wage</li> <li>• Not Met: Definition of living wage reviewed with unions</li> </ul> |
| 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"> <li>• Not Met: Discloses timebound target for suppliers to pay living wage or include in code or contracts: The Company discloses in its Supplier Responsibility Principles that 'suppliers must provide fair and equal compensation in accordance with applicable laws and standards'. However, no evidence found in relation to living wage or timeline to pay a living wage. [Suppliers Responsibility Principles, N/A: <a href="https://www.hormelfoods.com">hormelfoods.com</a>]</li> <li>• Not Met: Improving living wage practices of suppliers</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Assessment of number affected by payment below living wage</li> <li>• Not Met: Provides analysis of trends demonstrating progress</li> </ul>  |

| Indicator Code | Indicator name   | Score (out of 2) | Explanation  |
|----------------|--|------------------|--|
| D.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"> <li>• Not Met: Avoids business model pressure on HRs (purchasing practices): The Company states on its website: 'We are committed to aligning our procurement of goods and services with our environmental and social responsibility goals and initiatives, which includes advancing human rights. We are committed to reviewing and sharing our 20 by 30 Challenge goals with our suppliers to ensure there are no adverse business model pressures on vendor partners'. However, no further information was found describing the practices it adopts to avoid price or short notice requirements or other business considerations undermining human rights. [Suppliers - website, N/A: <a href="http://hormelfoods.com">hormelfoods.com</a>]</li> <li>• Not Met: Practices adopted to pay suppliers in line with agreed timeframes: In addition, it indicates: 'Additionally, we are committed to paying our suppliers within the agreed upon timeframes and to diligently follow up on any exceptions, while maintaining our adherence to our three-way match between purchase order, invoice and receipt'. No details found, however, on the specific practices it adopts to fulfill this commitment.</li> <li>• Not Met: Review own operations to mitigate negative impact</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Meets all requirements under score 1</li> <li>• Not Met: Examples of how it assessed, addressed and change purchasing practices</li> </ul> |
| D.1.3          | Mapping and disclosing the supply chain  | 0                | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Identifies direct and indirect suppliers back to manufacturing sites (factories or fields)</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Discloses names and locations of significant parts of SP and why</li> <li>• Not Met: Discloses which direct or indirect suppliers is involved in higher-risk activities</li> </ul>   |
| D.1.4.a        | Prohibition of child labour: Age verification and corrective actions (in own production or manufacturing operations) | 1                | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Does not use child labour: The Company states that it respects human rights. It says that 'this begins with how we treat each other and our business partners. It includes following the laws prohibiting forced and compulsory labor, child labor, employment discrimination and human trafficking.' [Code of Ethical Business Conduct, 2021: <a href="http://s25.q4cdn.com">s25.q4cdn.com</a>]</li> <li>• Met: Age verification of workers recruited: Hormel Foods states on its website that when it considers international investments, acquisitions and joint ventures, as part of the due diligence process it conducts research on human rights parameters to ensure compliance with all governing country or province laws regarding investment agreements, including verifying that the workforce is of appropriate and legal age. [Website, Human Right Statement, N/A: <a href="http://hormelfoods.com">hormelfoods.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Remediation if children identified</li> </ul>  |
| D.1.4.b        | Prohibition of child labour: Age verification and corrective actions (in the supply chain)                           | 0                | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Child Labour rules in codes or contracts: The Company discloses in its Supplier Responsibility Principles that it does not tolerate child labour and will not work with suppliers that do not agree to the policy. On the other hand, in its Supplier Code, it requires: 'Suppliers must not use or tolerate the use of human trafficking, forced labor or child labor as defined by the International Labour Organization. The term "child" refers to any person employed under the age of 15 (or 14 where the applicable laws permit), or under the age of completing compulsory education, or a minimum age for employment in the country.' However, no further evidence found such as verifying the age of job applicants and remediation programmes. [Suppliers Responsibility Principles, N/A: <a href="http://hormelfoods.com">hormelfoods.com</a>] &amp; [Supplier Code of Conduct (web), N/A: <a href="http://hormelfoods.com">hormelfoods.com</a>]</li> <li>• Not Met: How working with suppliers on child labour</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Assesment of number affected by child labour in supply chain</li> <li>• Not Met: Analysis of trends in progress made</li> </ul>   |

| Indicator Code | Indicator name   | Score (out of 2) | Explanation   |
|----------------|--|------------------|---|
| D.1.5.a        | Prohibition of forced labour: recruitment fees and costs (in own production or manufacturing operations) | 0                | The individual elements of the assessment are met or not as follows:<br>Score 1<br><ul style="list-style-type: none"> <li>• Not Met: Job seekers and workers do not pay recruitment fee: The Company states that it respects human rights. It begins with how it treats each other and business partners. It includes following the laws prohibiting forced and compulsory labour, child labour, employment discrimination and human trafficking. However, there is no information on whether the company requires job seekers and workers to pay any recruitment fee. [Code of Ethical Business Conduct, 2021: <a href="https://s25.q4cdn.com">s25.q4cdn.com</a>] &amp; [Website, Human Right Statement, N/A: <a href="https://hormelfoods.com">hormelfoods.com</a>]</li> <li>• Not Met: Commits to fully reimbursing if they have paid</li> </ul> Score 2<br><ul style="list-style-type: none"> <li>• Not Met: How practices are implemented and monitored for agencies, labour brokers or recruiters</li> </ul>          |
| 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:<br>Score 1<br><ul style="list-style-type: none"> <li>• Met: Debt and fees rules in codes or contracts: Hormel Foods discloses in its Supplier Responsibility Principles that 'suppliers must ensure that no fees or costs have been charged, directly or indirectly, in whole or in part, to job-seekers and employees for the services directly related to recruitment for temporary or permanent job placement'. [Suppliers Responsibility Principles, N/A: <a href="https://hormelfoods.com">hormelfoods.com</a>]</li> <li>• Not Met: How working with suppliers on debt &amp; fees</li> </ul> Score 2<br><ul style="list-style-type: none"> <li>• Not Met: Assessment of the number affected by payment of recruitment fees</li> <li>• Not Met: Analysis of trends in progress made</li> </ul>   |
| D.1.5.c        | Prohibition of forced labour: Wage practices (in own production or manufacturing operations)             | 0                | The individual elements of the assessment are met or not as follows:<br>Score 1<br><ul style="list-style-type: none"> <li>• Not Met: Pays workers in full and on time</li> <li>• Not Met: Payslips show any legitimate deductions</li> </ul> Score 2<br><ul style="list-style-type: none"> <li>• Not Met: How these practices are monitored for agencies, labour brokers or recruiters</li> </ul>   |
| D.1.5.d        | Prohibition of forced labour: Wage practices (in the supply chain)                                       | 0                | The individual elements of the assessment are met or not as follows:<br>Score 1<br><ul style="list-style-type: none"> <li>• Not Met: Suppliers to pay workers in full and on time in codes or contracts: The Company states in its Supplier Responsibility Principles that 'the pay program at Hormel Foods aims to attract, retain, motivate and reward highly qualified employees. Suppliers must provide fair and equal compensation in accordance with applicable laws and standards.' However, it is not clear whether the Company has a requirement for suppliers to pay workers in full and on time. [Suppliers Responsibility Principles, N/A: <a href="https://hormelfoods.com">hormelfoods.com</a>]</li> <li>• Not Met: How working with supply chain to pay workers regularly and on time</li> </ul> Score 2<br><ul style="list-style-type: none"> <li>• Not Met: Assessment of the number affected by failure to pay directly</li> <li>• Not Met: Provides analysis of trends demonstrating progress</li> </ul> |
| D.1.5.e        | Prohibition of forced labour: Restrictions on workers (in own production or manufacturing operations)    | 0                | The individual elements of the assessment are met or not as follows:<br>Score 1<br><ul style="list-style-type: none"> <li>• Not Met: Does not retain documents or restrict movement</li> </ul> Score 2<br><ul style="list-style-type: none"> <li>• Not Met: How these practices are monitored for agencies, labour brokers or recruiters</li> </ul>   |
| 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:<br>Score 1<br><ul style="list-style-type: none"> <li>• Met: Free movement rules in codes or contracts: The Company states in its Suppliers Responsibility Principles that suppliers must not retain any documents or demand monetary deposits or other collateral as a condition of employment, and workers cannot be subject to the withholding of wages, identification cards, passports or other travel documents, or personal belongings without their consent. [Suppliers Responsibility Principles, N/A: <a href="https://hormelfoods.com">hormelfoods.com</a>]</li> <li>• Not Met: How working with suppliers on free movement</li> </ul> Score 2<br><ul style="list-style-type: none"> <li>• Not Met: Assessment of the number affected by retaining docs or restricting movement</li> <li>• Not Met: Provides analysis of trends demonstrating progress</li> </ul>  |

| Indicator Code | Indicator name   | Score (out of 2) | Explanation   |
|----------------|--|------------------|---|
| D.1.6.a        | Freedom of association and collective bargaining (in own production or manufacturing operation)                              | 1                | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Commits not to interfere with union rights / Steps to avoid intimidation or retaliation: The Company states that it adheres to the National Labour Relations Act and respects the rights of employees to choose whether or not they want to organize in a collective bargaining unit. It does not have any operations in which the right to exercise freedom of association and collective bargaining is at significant risk. However, there is no description about practical measures to prohibit retaliation against workers who seeks to exercise these rights. [Corporate Responsibility 2020 CR Report, 25/10/2020: <a href="https://www.hormelfoods.com">csr.hormelfoods.com</a>]</li> <li>• Met: Discloses % total direct operations covered by collective CB agreements: The Company reports that in 2020, 20% of workforce are covered by collective bargaining agreement. [Corporate Responsibility 2020 CR Report, 25/10/2020: <a href="https://www.hormelfoods.com">csr.hormelfoods.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Meets both requirements under score 1</li> </ul>   |
| D.1.6.b        | Freedom of association and collective bargaining (in the supply chain)   | 0                | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: FoA &amp; CB rules in codes or contracts: Hormel Foods presents in its Supply Responsibility Principles that values suppliers that protect workers' rights to exercise freedom of association. However, it is not clear if it this is a requirement in the contract and there is no mention of collective bargaining . [Suppliers Responsibility Principles, N/A: <a href="https://www.hormelfoods.com">hormelfoods.com</a>]</li> <li>• Not Met: How working with suppliers on FoA and CB</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Assessment of the number affected by restrictions to FoA and CB in the SP</li> <li>• Not Met: Provides analysis of trends demonstrating progress</li> </ul>  |
| D.1.7.a        | Health and safety: Fatalities, lost days, injury, occupational disease rates (in own production or manufacturing operations) | 0.5              | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Describes process to identify H&amp;S risks and impacts: The Company states that 'our company's Event Evaluation Committee, consisting of senior leaders, along with our risk management, operations and human resources teams, worked collaboratively to identify and mitigate risks, and develop processes to continue to provide a safe, secure working environment.' It also states that its corporate safety department develops and administers companywide policies to ensure the safety of its team members and compliance with Occupational Safety and Health Administration (OSHA) standards. The corporate safety department also conducts regular audits of its production facilities to ensure compliance with company safety policies. [Corporate Responsibility 2020 CR Report, 25/10/2020: <a href="https://www.hormelfoods.com">csr.hormelfoods.com</a>]</li> <li>• Met: Injury Rate or Lost days or Near miss disclosures for last reporting period: The Company reports that in 2020, number of recordable incidents per 100 full-time employees (total case incident rate) was 2.6. [Corporate Responsibility 2020 CR Report, 25/10/2020: <a href="https://www.hormelfoods.com">csr.hormelfoods.com</a>]</li> <li>• Not Met: Fatalities for lasting reporting period</li> <li>• Not Met: Occupational disease rate for last reporting period</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Set targets for H&amp;S performance: The Company states that its goal is to provide a safe workplace for all team members and reduce injury/illness rates each year. However, no further information found in regards to the target it aims to. [Corporate Responsibility 2020 CR Report, 25/10/2020: <a href="https://www.hormelfoods.com">csr.hormelfoods.com</a>]</li> <li>• Not Met: Met targets or explains why not or how improve management systems</li> </ul> |
| 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"> <li>• Met: Sets out clear Health and Safety requirements: The Company states in its Supplier Responsibility Principles that 'Hormel Foods supports a high standard for ensuring employee health and safety. Suppliers must be in compliance with applicable safety and health regulations, and applicable laws and regulations relating to working conditions. Suppliers should have appropriate controls, procedures and preventative training to ensure a safe work environment for employees.' [Suppliers Responsibility Principles, N/A: <a href="https://www.hormelfoods.com">hormelfoods.com</a>]</li> <li>• Not Met: Injury Rate or Lost days or Near miss disclosures for last reporting period</li> <li>• Not Met: Fatalities rate for lasting reporting period</li> <li>• Not Met: Occupation disease rate for last reporting period</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: How working with suppliers on H&amp;S</li> </ul>   |

| Indicator Code | Indicator name  | Score (out of 2) | Explanation  |
|----------------|---|------------------|--|
|                |   |                  | <ul style="list-style-type: none"> <li>• Not Met: Assessment of the number affected by H&amp;S issues in the SP</li> <li>• Not Met: Provides analysis of trends demonstrating progress</li> </ul>  |
| D.1.8.a        | Land rights: Land acquisition (in own production or manufacturing operations) | 0                | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Approach to identification of land tenure rights holders</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: How valuation and compensation works</li> <li>• Not Met: Follows IFC PS 5 in any state land deals</li> </ul>   |
| 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"> <li>• Not Met: Rules on land &amp; owners in codes or contracts: The Company states that it requires all suppliers to legally acquire land rights and operations and to protect high conservation value areas, high carbon stock forests, rainforests and peatlands (regardless of depth). However, it has not provided details on negotiation process to provide adequate compensation or requested alternatives to financial compensation. [Suppliers Responsibility Principles, N/A: <a href="http://hormelfoods.com">hormelfoods.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: How working with suppliers on land issues</li> <li>• Not Met: Includes resettlement requirements that the supplier provides financial compensation</li> <li>• Not Met: Assessment of the number affected by land rights issues in its SP</li> <li>• Not Met: Provides analysis of trends demonstrating progress</li> </ul>   |
| D.1.9.a        | Water and sanitation (in own production or manufacturing operations)          | 1                | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Action to prevent water and sanitation risks: The Company states that it evaluates its operations to determine the business risk associated with water scarcity. After evaluation, it confirmed that Hormel Foods does not have manufacturing operations in areas defined as water-scarce regions by the Food and Agriculture Organization of the United Nations. It has identified three manufacturing facilities which are located in regions defined as overall high risk, using the World Resources Institute's Aqueduct Water Risk Atlas. Access-to-water risk remains low at all domestic manufacturing locations, and it remains committed to driving water reduction and efficiency improvements at these and all manufacturing locations. [Corporate Responsibility 2020 CR Report, 25/10/2020: <a href="http://csr.hormelfoods.com">csr.hormelfoods.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Water targets considering local factors: In addition, the Company discloses information about its water related targets in its '20 by 30 Challenge': 'each year we aim to achieve [...], a 2% reduction in water use. We also aim to achieve annual efficiency gains of 1% in energy and water use. [...] Advance our water stewardship efforts through initiatives in our top six priority watersheds.' However, no further information was found indicating that it considers local factors when establishing targets. [Our 20 by 30 Challenge, N/A: <a href="http://hormelfoods.com">hormelfoods.com</a>]</li> <li>• Not Met: Reports progress and shows trends in progress made</li> </ul> |
| D.1.9.b        | Water and sanitation (in the supply chain)                                    | 1                | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Rules on water stewardship in codes or contracts: The Company states in its Supplier Responsibility Principles that 'Hormel Foods recognizes the critical role that sustainable agricultural practices play in meeting the world's food demands while protecting our natural resources. We recognize a shared interest and need to support the principles outlined in the United Nations Sustainable Development Goals, especially those sections involving water scarcity and water quality. In addition to the expectations outlined in this document, members of our agricultural supply chain should reference the objectives and requirements of our Environmental Policy Statement and Sustainable Agriculture Policy.' [Suppliers Responsibility Principles, N/A: <a href="http://hormelfoods.com">hormelfoods.com</a>]</li> <li>• Met: How working with suppliers on water stewardship issues: The Company states that It also has published Sustainable Agriculture Policy and completed a high-level water risk assessment of its top suppliers through participation in the AgWater Challenge. It has completed first water risk questionnaire set with key suppliers to gain additional insight into the supply chain management of water risks. In 2018, we helped launch the Cedar River Watershed Partnership — a public private partnership aimed at improving water quality in this watershed within our</li> </ul>  |

| Indicator Code | Indicator name   | Score (out of 2) | Explanation   |
|----------------|--|------------------|---|
|                |  |                  | supply chain." [Corporate Responsibility 2020 CR Report, 25/10/2020: <a href="http://csr.hormelfoods.com">csr.hormelfoods.com</a> ] & [Suppliers Responsibility Principles, N/A: <a href="http://hormelfoods.com">hormelfoods.com</a> ]<br>Score 2<br><ul style="list-style-type: none"> <li>• Not Met: Assessment on the number affected by lack of access to water and sanitation</li> <li>• Not Met: Provides analysis of trends demonstrating progress</li> </ul>   |
| D.1.10.a       | Women's rights (in own production or manufacturing operations) | 0                | The individual elements of the assessment are met or not as follows:<br>Score 1<br><ul style="list-style-type: none"> <li>• Not Met: Process to stop harassment and violence against women: The Company states in its Code of Conduct that it 'has zero tolerance for any form of harassment, including sexual harassment and bullying, that targets any member of our workforce. Freedom from harassment and abuse creates a respectful and inclusive culture where we all can be productive, and everyone feels respected.' However, no further information describing its process(es) to prohibit and address harassment, intimidation and violence against women was found. [Code of Ethical Business Conduct, 2021: <a href="http://s25.q4cdn.com">s25.q4cdn.com</a>]</li> <li>• Not Met: Working conditions take account of gender</li> <li>• Not Met: Measures and steps to address gender pay gap at all levels of employment: In addition, it indicates in its Corporate Responsibility Report 2020: 'We work hard to ensure we engage in nondiscriminatory pay practices so that our team members are compensated fairly and appropriately, regardless of gender, race, age or any other protected status. In 2020, there were no substantiated reports of pay discrimination.[...] Hormel Foods is committed to having an inclusive workplace and has nine employee resource groups (ERGs): [...] Women's Insights Network. We partner with a wide array of business associations to support inclusion and diversity both internally and externally. Some of our partners include [...] the Society of Women Engineers [...]. Senior leaders of our company (directors and officers) are held accountable to creating an inclusive, diverse workplace through their yearly incentive plans, which focus on overall belonging scores and the representation of women and underrepresented minorities in our salaried positions'. No details found, however in relation to gender pay gap specifically. [Corporate Responsibility 2020 CR Report, 25/10/2020: <a href="http://csr.hormelfoods.com">csr.hormelfoods.com</a>]</li> </ul> Score 2<br><ul style="list-style-type: none"> <li>• Not Met: Meets all requirements under score 1</li> <li>• Not Met: Provides analysis of trends demonstrating closing gender pay gap</li> </ul> |
| D.1.10.b       | Women's rights (in the supply chain)                           | 0                | The individual elements of the assessment are met or not as follows:<br>Score 1<br><ul style="list-style-type: none"> <li>• Not Met: Women's rights in codes or contracts: Although the Company's Supplier Code include provisions against discrimination and harassment, no reference to women's rights was found. [Supplier Code of Conduct (web), N/A: <a href="http://hormelfoods.com">hormelfoods.com</a>]</li> <li>• Not Met: How working with suppliers on women's rights</li> </ul> Score 2<br><ul style="list-style-type: none"> <li>• Not Met: Assessment on the number affected by discrimination or unsafe working conditions</li> <li>• Not Met: Provides analysis of trends demonstrating progress</li> </ul>   |

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

| Indicator Code | Indicator name          | Score (out of 2) | Explanation  |
|----------------|-------------------------|------------------|--|
| E(1).0         | Serious allegation No 1 |                  | No allegations meeting the CHRB severity threshold were found, and so the score of 10.36 out of 80 points scored in themes A-D has been applied to produce a score of 2.59 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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