

Company Name Mazda Motor Corporation
Industry Automotive (Own Operations and Supply Chain)
Overall Score 7.0 out of 100

Theme Score	Out of	For Theme
0.3	10	A. Governance and Policies
1.6	25	B. Embedding Respect and Human Rights Due Diligence
2.0	20	C. Remedies and Grievance Mechanisms
1.7	25	D. Performance: Company Human Rights Practices
1.4	20	E. Performance: Responses to Serious Allegations

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

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

Detailed assessment

A. Governance and Policies (10% of Total)

A.1 Policy Commitments (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1.1	Commitment to respect human rights	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: General HRs commitment: In its feedback to CHRB, the Company has provided different sources disclosing its UN Global Compact profile and commitment and its Valuable 500 Commitment with news releases on each topic. However, no publicly available policy statement found committing it to respect human rights. Commitments are expected to be placed in Company policy documents. UN Global Compact is no longer a proxy for a commitment to respecting Human Rights according CHRB revised approach. • Not Met: Universal Declaration of Human rights (UDHR) • Not Met: International Bill of Human Rights Score 2 <ul style="list-style-type: none"> • Not Met: Commitment to the UNGPs • Not Met: Commitment to the OECD Guidelines for Multinational Enterprises
A.1.2.a	Commitment to respect the human rights of workers: ILO Declaration on Fundamental Principles and Rights at Work	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Company has a commitment to the ILO Core: The Company stated in its CSR report that one of the Company's goals is to 'Continue to support international initiatives, including the Universal Declaration of Human Rights and the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work'. Furthermore, it stated that Mazda 'Continued to clarify support for both declarations, in the Mazda Sustainability Report 2018'. However, previous assessment used evidence from the Company's 2019 CSR Report, which CHRB no longer considers a suitable source for policy statements. No further evidence found. <ul style="list-style-type: none"> • Not Met: Company has a explicit commitment to All four ILO Core

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			<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: At its Supplier CSR Guidelines, the Company indicates 'items' in relation to 'respect for people'. It includes 'Abolition of discrimination; (...) Prohibition of child labor; Prohibition of forced labor; (...) We recognize and respect the right of employees to freedom of association or non-association under the legislations in each country and region'. However, regarding the right to freedom of association, it is not clear whether it is committed to respect these rights in all contexts and locations (i.e. alternative mechanisms for those countries where there are legal restrictions to the exercise of these rights), as the Company indicates that it respects these rights 'under the legislations in each country and region'. Moreover, no reference to the commitment to respect the right to bargain collectively. Lastly, the Supplier CSR Guidelines, it indicates that 'We ask our suppliers to familiarize themselves with the aims of the updated Guidelines, continue promoting actions in each company to discharge their CSR'. Hence, it is not clear the Company expects suppliers to commit to the principles set out at the guide. [Supplier CSR Guidelines, 12/2018: mazda.com]
A.1.2.b	Commitment to respect the human rights of workers: Health and safety and working hours	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: Commitment to respect H&S of workers: The Company stated that 'Under its Safety and Health Creed, Mazda is proactively working to develop people, workplaces, and mechanisms that ensure the safety and health of the employees'. However, the previous assessment used evidence from the Company's 2019 CSR Report, which CHRB no longer considers a suitable source for policy statements. No further evidence found. [2019 CSR Report, 11/2019: mazda.com] • 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"> • Not Met: Expect suppliers to commit to H&S of their workers: The Company indicates, on its Supplier CSR Guidelines, that 'We place top priority on safety and health of our employees in their workplace, and strive to prevent accidents and hazards'. Regarding its Supplier CSR Guidelines, it also states 'We ask our suppliers to familiarize themselves with the aims of the updated Guidelines, continue promoting actions in each company to discharge their CSR'. However, it is not clear the Company expects suppliers to commit to the principles set out at the guide. Moreover, the past assessment was also partially based on the Company's 2019 CSR Report, which CHRB no longer considers is a suitable source for policy statements. No further evidence found. [Supplier CSR Guidelines, 12/2018: mazda.com] & [2019 CSR Report, 11/2019: mazda.com] • Not Met: Expect suppliers to commit to ILO labour standard or to 48 hours regular work week: The Supplier CSR Guidelines states that 'We comply with regulations in each country and region for employees' work hours (including overtime), holidays, annual paid leaves and others'. 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. Moreover, regarding its Supplier CSR Guidelines, it indicates that 'We ask our suppliers to familiarize themselves with the aims of the updated Guidelines, continue promoting actions in each company to discharge their CSR'. Hence, it is not clear the Company expects suppliers to commit to the principles set out at the guide. [Supplier CSR Guidelines, 12/2018: mazda.com]
A.1.3.a.MO	Commitment to respect human rights particularly relevant to the industry – responsible sourcing of minerals (MO)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Responsible mineral sourcing • Not Met: Based on OECD Guidance • Not Met: Requires suppliers to commit to responsible mineral sourcing: The Company states; Supplier CSR Guidelines, that 'Non-use of conflict minerals and other raw materials that may cause social issues: We stay on top of the issue of raw materials that contribute to inhumane acts and take appropriate actions to avoid using such materials'. However, regarding its Supplier CSR Guidelines, it also indicates that 'We ask our suppliers to familiarize themselves with the aims of the updated Guidelines, continue promoting actions in each company to discharge their CSR'. Therefore, it is not clear the Company requires suppliers to commit to the principles set out at the guide. Furthermore, the previous assessment was also partially based on the 2019 CSR Report which CHRB no longer considers as a suitable source for policy statements. [Supplier CSR Guidelines, 12/2018: mazda.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			Score 2 <ul style="list-style-type: none"> • Not Met: Commits to follow OECD Guidance for all minerals • Not Met: Suppliers expected to make similar requirements of their suppliers
A.1.3.b.MO	Commitment to respect human rights particularly relevant to the industry – vulnerable groups (MO)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Women's rights • Not Met: Children's rights • Not Met: Migrant worker's rights • Not Met: Expects suppliers to respect these rights Score 2 <ul style="list-style-type: none"> • Not Met: CEDAW/Women's Empowerment Principles • Not Met: Child Rights Convention/Business Principles • Not Met: Convention on migrant workers • Not Met: Expecting suppliers to respect these rights
A.1.4	Commitment to remedy	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: The Company commits to remedy • Not Met: Company expect suppliers to make this commitment Score 2 <ul style="list-style-type: none"> • Not Met: Collaborating with other remedy initiatives • Not Met: Work with suppliers to remedy impact
A.1.5	Commitment to respect the rights of human rights defenders	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Zero tolerance attacks on HRs Defenders (HRDs) • Not Met: Company expect suppliers to make this commitment Score 2 <ul style="list-style-type: none"> • Not Met: Work with HRD to create safe and enabling environment

A.2 Policy Commitments (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.2.1	Commitment from the top	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Board level responsibility for HRs: The 2021 Sustainability Report states 'The Human Rights Committee, comprising executive officers and division general managers, deliberates on human rights activities, and based on their decisions the Human Resources Division promotes human rights protection activities and resolves issues throughout the Group. Each division manager leads the division's activities as the human rights promotion officer at Mazda Motor Corporation, while the person in charge of human rights leads activities at each Mazda business location as well as at Group companies in Japan and overseas'. However, this evidence refers to senior responsibility and human rights operation. This indicator looks for evidence of supervisory board level committee oversight responsibility. No further evidence found. The Company has provided comments to CHRB regarding this indicator. However, the content of it was already in use. [2021 Sustainability Report, 03/2022: mazda.com] • Not Met: Describe HR expertise of Board member Score 2 <ul style="list-style-type: none"> • Met: Speeches/letters by Board members or CEO: The Company states 'The Company president delivers to all employees a message on the importance of respect for human rights every year during Human Rights Week, in connection with Human Rights Day on December 10.' [2019 CSR Report, 11/2019: mazda.com]
A.2.2	Board responsibility	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Board/Committee review HRs strategy: The Company states that it has a human rights committee at executive level. However, no further description found of the processes it has in place to discuss and regularly review its human rights strategy or policy or management processes at board level or a board committee. [2021 Sustainability Report, 03/2022: mazda.com] • Not Met: Examples/trends re HR discussion in the last reporting period Score 2 <ul style="list-style-type: none"> • Not Met: Meets both requirements under score 1 • Not Met: How affected stakeholders/HR experts informed discussions
A.2.3	Incentives and performance management	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Incentives for at least one board member: The Company states that 'The remuneration of internal directors (excluding directors who are Audit & Supervisory Committee members and outside directors) and executive officers consists of 1) a fixed amount of basic remuneration commensurate with their

Indicator Code	Indicator name	Score (out of 2)	Explanation
			responsibilities, 2) performance-based remuneration determined at the end of the fiscal year in accordance with a designated standard and process after evaluating how much has been achieved toward goals set based on the business plan, and 3) compensation in the form of stock options under a system introduced to incentivize contributions toward enhancing corporate value over the medium and long term and to share the benefits with shareholders'. However, no further details regarding variable remuneration linked to human rights performance were found. [2021 Annual Report, 31/03/2021: mazda.com] <ul style="list-style-type: none"> • Not Met: At least one key HR risk, beyond employee H&S Score 2 <ul style="list-style-type: none"> • Not Met: Performance criteria made public • Not Met: Review of other board performance criteria
A.2.4	Business model strategy and risks	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Board process to review bussiness model and strategy • Not Met: Describe frequency and triggers for reviewing Score 2 <ul style="list-style-type: none"> • Not Met: Meets both requirements under score 1 • Not Met: Example of actions decided

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

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.1	Responsibility and resources for day-to-day human rights functions	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Score of 1 on A.1.2.a: See indicator A.1.2.a • Met: Senior responsibility for HR implementation and decision making: The Company states 'The Human Rights Committee, comprising executive officers and division general managers, deliberates on human rights activities'. [2021 Sustainability Report, 03/2022: mazda.com] Score 2 <ul style="list-style-type: none"> • Met: How it assigns Day-to-day responsibility: See above, 'based on their [Human Rights Committee] decisions the Human Resources Division promotes human rights protection activities and resolves issues throughout the Group. Each division manager leads the division's activities as the human rights promotion officer at Mazda Motor Corporation, while the person in charge of human rights leads activities at each Mazda business location as well as at Group companies in Japan and overseas'. [2021 Sustainability Report, 03/2022: mazda.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not Met: Day-to-day resources and expertise allocation in own ops: The 2021 Sustainability Report indicates: 'At Group companies in Japan, a network has been established to exchange opinions on a regular basis. Serious human rights violations identified through the network are reported to executive officers and other management-level members of Mazda Motor Corporation, providing a framework that enables the implementation of Group-wide solutions'. However, it is not clear how it allocates resources and expertise for the day-to-day management of relevant human rights issues within its own operations beyond Japan (and conflict resolution). Moreover, 'Mazda has established a Human Rights Counselling Desk and a Female Employee Counselling Desk to appropriately respond human rights consultations from employees, through providing advices and supporting early relief from human rights violations. Mazda has set out regulations mandating strict confidentiality, guaranteeing immunity from reprisals, and ensuring that no disadvantage will accrue to employees who request consultations. Counselling is offered in various forms, such as face-to-face, by telephone, or by e-mail. Mazda promptly responds to consultations, with the goal of rapidly improving the work environment for the affected employee, while taking necessary measures against the relevant violator based on factual inquiry. The Company also offers the necessary support to ensure respect for human rights throughout the entire workplace, through the abovementioned counseling desks. For example, these desks offer advice on workplace culture improvement to the employee's supervisor, and provide counseling and advice for the employees and other persons concerned'. However, although the Company indicates it has these two Counseling Desks and that it provides counseling service to its employees, no further evidence found of how it allocates expertise for the day-to-day management of relevant human rights issues within its own operations. Current evidence seems to be a service provided to employees rather than an active system to embed policy commitments across its own operations. [2021 Sustainability Report, 03/2022: mazda.com] • 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: As stated on indicator A.2.3, executive managers and directors are eligible for variable remuneration linked to performance. However, there is no clear evidence that human rights performance is considered. [2021 Sustainability Report, 03/2022: mazda.com] • 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 senior management performance
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"> • Not Met: HR risks is integrated as part of enterprise risk system: The 2022 Corporate Government Report discloses its Governance System framework. Five committees are found under its ECM [enterprise risk management] and other president advisory committee/organization: Health & Safety Committee; Quality Committee; Risk & Compliance Committee; Human Right Committee; Security Export Control Committee. However, no description found of how attention to human rights risks is integrated into its broader enterprise risk management system. [2022 Corporate Government Report, 27/06/2022: mazda.com] • Not Met: Provides an example <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Audit Ctte or independent risk assessment
B.1.4.a	Communication /dissemination of policy commitment(s) to workers and external stakeholders	0.5	<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: Score of 1 on A.1.2.a: See indicator A.1.2. • Met: Communicates its policy to all workers in own operations: The Company states that 'Mazda endeavors to deepen awareness and understanding of CSR among all its executive officers and employees, and to promote the undertaking of CSR initiatives in the course of their daily business activities. The level of employees' CSR awareness is confirmed through Global Employee Survey. To ensure constant improvement of the CSR awareness level, Mazda will continue a range of initiatives'. This includes trainings, distribution of the sustainability report and other measures. The Company states that 'To raise awareness of human rights, Mazda requires all executive officers and employees to consider human rights issues by participating in training programs and educational activities'. [2019 CSR Report, 11/2019: mazda.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<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: See A.1.2. • Met: Requires suppliers to communicate policy requirements: The Company states that 'In cooperation with suppliers and dealerships, Mazda has established a CSR initiative promotion system throughout the entire value chain. The Company places emphasis on dialogues with stakeholders, to ensure that its CSR initiatives not only comply with international rules as well as the laws and regulations of each country/region, but also respect local history, culture, and customs'. In the supplier guidelines, it indicates that 'We ask our suppliers to familiarize themselves with the aims of the updated Guidelines, continue promoting actions in each company to discharge their CSR, and cascade the updated Guidelines to their suppliers so as to ensure robust CSR actions will be taken throughout our supply chain.' [Supplier CSR Guidelines, 12/2018: mazda.com] & [2019 CSR Report, 11/2019: mazda.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: How HR commitments made binding/contractual • Not Met: Company requires suppliers to cascade down to their suppliers
B.1.5	Training on Human Rights	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Scores at least 1 on A.1.2.a: See indicator A.1.2. • Met: How workers are trained on HR policy commitments: The Company states that 'To raise awareness of human rights, Mazda requires all executive officers and employees to consider human rights issues by participating in training programs and educational activities'. [2019 CSR Report, 11/2019: mazda.com] • Not Met: Trains relevant managers including procurement: The Company states that it 'also holds event-based training such as human rights lectures for executive officers and senior managers. Moreover, the Company also holds training programs by department that are customized to each department in response to its specific needs'. However, no further details found regarding how human rights training programs are designed for specific management roles, including at least procurement. [2021 Sustainability Report, 03/2022: mazda.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Score of 2 on A.1.2.a: See indicator A.1.2. • Not Met: Meets both requirements under score 1 • Not Met: Trains suppliers to meet company's HR commitment: It indicates: 'Seeing all the suppliers as its important business partners, the Company takes steps to promptly brief suppliers on medium- to long-term business strategies and on matters related to sales and production, and arranges opportunities for information exchange and dialogues on a regular basis. As part of such efforts, Mazda organizes an annual seminar with the aim of enhancing awareness of environmental and other sustainability initiatives. The Company also maintains close liaisons with supplier-managed purchasing cooperative organizations'. However, it is not clear the training it provides to suppliers to help them meet its human rights policy commitments. [2021 Sustainability Report, 03/2022: mazda.com] • Not Met: Disclose % trained
B.1.6	Monitoring and corrective actions	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Scores at least 1 on A.1.2.a: See indicator A.1.2. • Met: Monitoring implementation of HR policy commitments across global ops and supply chain: Regarding its own operations, the Company indicates: 'At Group companies in Japan, a network has been established to exchange opinions on a regular basis. Serious human rights violations identified through the network are reported to executive officers and other management-level members of Mazda Motor Corporation, providing a framework that enables the implementation of Group-wide solutions. Moreover, once a year, the Global Employee survey is conducted to check the progress in human rights protection activities in each region around the world and confirm whether there is any problem to be addressed or not'. As for its supply chain, it notes: 'For each long-term supplier, Mazda conducts (...) a comprehensive evaluation of the entire business including the (...) status of its sustainability initiatives'. Also: 'Mazda has conducted questionnaire surveys of its suppliers since FY March 2014, aiming to understand and evaluate the status of their implementation of sustainability initiatives(...)' Using these surveys, the Company also checks each supplier's recognition of the

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			<p>Mazda Supplier CSR Guideline'. The CSR Guideline contains the Company's human rights expectations. [2021 Sustainability Report, 03/2022: mazda.com]</p> <ul style="list-style-type: none"> • Not Met: Proportion of supply chain monitored: The Company indicates: 'In FY March 2021, a questionnaire survey was carried out about fair business practices, which attracted a lot of social interest. The survey was targeted at 114 suppliers, a major percentage of whose sales consisted of products delivered to Mazda'. However, it is not clear the proportion of its supply chain that is monitored. [2021 Sustainability Report, 03/2022: mazda.com] • Not Met: Describe how workers are involved in monitoring: Regarding its Systems for Promoting Human Rights, the Company indicates: 'At Group companies in Japan, a network has been established to exchange opinions on a regular basis. Serious human rights violations identified through the network are reported to executive officers and other management-level members of Mazda Motor Corporation, providing a framework that enables the implementation of Group-wide solutions'. No further evidenced found on how workers are involved in monitoring human rights beyond Japan's own operations. [2021 Sustainability Report, 03/2022: mazda.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Score of 2 on A.1.2.a: See indicator A.1.2. • Not Met: Describes corrective action process: The Company states, regarding its own operations: 'Mazda carries out various initiatives to eliminate human rights violations. In case a problem involving human rights violations occurs, the Company discloses the case on the intranet as an example of disciplinary action, and conducts educational and awareness raising activities in order to prevent a recurrence. Mazda records the results of handling these cases and manages in accordance with the stipulated procedure, and reports to the Human Rights Committee. These records are used to formulate more effective Companywide policies and to prevent the recurrence of similar problems'. As for its Questionnaire Survey for Suppliers: 'After analyzing these results, the Company held individual hearings with companies deemed to be in need of further improvement, in order to offer them cooperation in devising improvement methods'. No further details found, including follow up on corrective process. [2021 Sustainability Report, 03/2022: mazda.com] • Not Met: Disclose findings and number of corrective action: The Company indicates: 'The survey results [Questionnaire Survey for Suppliers] showed that progress has been made since FY March 2020'. However, no further details found of the findings and the number of corrective action processes as a result of the monitoring. [2021 Sustainability Report, 03/2022: mazda.com]
B.1.7	Engaging and terminating business relationships	0.5	<p>The individual elements of the assessment are met or not as follows: Score 1</p> <ul style="list-style-type: none"> • Met: HR affects selection of suppliers: The Company states that 'Upon receiving a request to start business with Mazda, Mazda assesses the company in question in a fair and even-handed manner according to its in-house criteria for evaluation of suppliers, and determines the feasibility of a business partnership. In addition, Mazda bases its assessments of business dealings with its suppliers on a comprehensive evaluation that covers not only quality, technical strengths, pricing, delivery time and management approach, but also the corporate compliance structure and CSR initiatives, including environmental protection activities'. Furthermore, 'The Company stipulated the Mazda Supplier CSR Guidelines, based on Mazda's basic approach on CSR initiatives [...]. In the Guidelines, CSR activities are categorized into six areas: Customer Satisfaction (Safety/Quality), Environment, Social Contribution, Respect for People (Human Rights/Work), Compliance, and Information Disclosure. The Guidelines request that all Mazda suppliers comply with the guidelines in these areas.' In addition, 'When starting business with a new supplier, related departments coordinate together to confirm the supplier's quality control system, research & development system, technological capabilities, financial conditions, and CSR initiatives, in order to evaluate whether or not the supplier is compliant with the procurement/selection policies of the Mazda Group'. [2019 CSR Report, 11/2019: mazda.com] • Not Met: HR affects on-going supplier relationships: The Company explains its Supplier Evaluation System: 'For each long-term supplier, Mazda conducts not only an evaluation based on the quality, cost and delivery time of the procured goods or services, but also a comprehensive evaluation of the entire business including the quality control system, research & development system, technological capabilities, and the status of its sustainability initiatives. For the supplier quality control system, Mazda employs a system that enables continuous grasping of issues, evaluation of the situation, and provision of guidance for improvement by receiving daily reports on product quality as well as voluntary audit results, and when a

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			<p>supplier is in need of quality improvement, conducts quality auditing that involves onsite confirmation of actual products at both domestic and overseas sites. Also, Mazda comprehensively evaluates its suppliers every year (295 suppliers in 2020) from the perspectives of quality, pricing, delivery time, etc., in order to build more positive business relationships with them, and passes the results of these evaluations back to the suppliers. Outstanding suppliers are recognized with awards. The Company has also introduced sustainability-based evaluation, giving special awards to suppliers that have made outstanding proposals on weight trimming, which greatly affects environmental performance such as fuel efficiency'. However, no further description found of how human rights performance is taken into account in decisions to renew, expand or terminate business relationships, including with suppliers. [2021 Sustainability Report, 03/2022: mazda.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describe positive incentives offered to respect human rights: The Company states that 'Outstanding suppliers are recognized with awards. The Company has also introduced sustainability-based evaluation, giving special awards to suppliers that have made outstanding proposals on weight trimming, which greatly affects environmental performance such as fuel efficiency'. However, it is not clear if human rights performance is taken into account when awarding specific incentives. [2021 Sustainability Report, 03/2022: mazda.com] • Not Met: Working with suppliers to meet HR requirements: The Company provides Example of Sustainability Initiatives in Cooperation with Suppliers, where it mentions 'Activities to Address Problems regarding Conflict Minerals' and 'Promotion of Fair Business Practices'. Also, it indicates: 'Seeing all the suppliers as its important business partners, the Company takes steps to promptly brief suppliers on medium- to long-term business strategies and on matters related to sales and production, and arranges opportunities for information exchange and dialogues on a regular basis. As part of such efforts, Mazda organizes an annual seminar with the aim of enhancing awareness of environmental and other sustainability initiatives. The Company also maintains close liaisons with supplier-managed purchasing cooperative organizations'. However, no further description found of how it supports business relationships, including suppliers, in meeting the Company's human rights requirements. [2021 Sustainability Report, 03/2022: mazda.com]
B.1.8	Approach to engagement with affected stakeholders	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Stakeholder process or systems to identify and engage with workers/communities in the last two years: The Company discloses its stakeholders, its 'key responsibilities and issues' and 'Opportunities for Key Dialogue and Information Disclosure (Frequency)' for each group. Stakeholders include: employees, business partners (including suppliers), global society and local communities (including community people and NGOs). However, it is not clear how it has identified and engaged with affected stakeholders, including workers or local communities in its supply chain, in the last two years. [2021 Sustainability Report, 03/2022: mazda.com] • Not Met: Discloses stakeholders that HRs may be affected • Not Met: Provides two examples of engagement with stakeholders <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Analysis of stakeholder views on company's HR issues: The Company indicates: 'Since FY March 2014, Mazda has conducted a Stakeholder Survey (once a year; cancelled in FY March 2021 due to the impact of the novel coronavirus (COVID-19), inviting opinions from stakeholders outside the Company regarding employee conduct and attitudes toward the promotion of brand value management. The submitted opinions and their analysis results are shared with top management. After clarifying the actual situations and issues to be addressed, the results are announced to Mazda employees and employees of the entire Group in Japan and abroad through MBLD (...). This provides these employees with opportunities to review their own actions and practices, from the perspective of implementing the corporate vision and strengthening connections with stakeholders'. However, no evidence found of analysis of the input/views given by the stakeholders on human rights issues, and how it was taken into account. [2021 Sustainability Report, 03/2022: mazda.com] • Not Met: Describe how views influenced company's HR approach

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.1	Identifying human rights risks and impacts	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Identifying risks in own operations: Regarding its own operations: 'At Group companies in Japan, a network has been established to exchange opinions on a regular basis. Serious human rights violations identified through the network are reported to executive officers and other management-level members of Mazda Motor Corporation, providing a framework that enables the implementation of Group-wide solutions. Moreover, once a year, the Global Employee survey is conducted to check the progress in human rights protection activities in each region around the world and confirm whether there is any problem to be addressed or not. The results of the survey are fed back to each management and improvement measures are taken as needed'. However, the evidence seems to refer to compliance monitoring rather than due diligence carried out to determine the potential human right risks and impacts it faces as a Company. It is not clear whether and how it integrates these processes to identify and assess potential risks and impacts. [2021 Sustainability Report, 03/2022: mazda.com] • Not Met: Identifying risks through relevant business relationships: As for its supply chain: 'Mazda has conducted questionnaire surveys of its suppliers since FY March 2014, aiming to understand and evaluate the status of their implementation of sustainability initiatives. The survey results confirm that these suppliers have appropriately implemented sustainability initiatives and established their own sustainability promotion systems'. However, the evidence seems to refer to compliance monitoring rather than due diligence carried out to determine the potential human right risks and impacts of its supply chain. [2021 Sustainability Report, 03/2022: mazda.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describe ongoing global risk identification in consultation with stakeholder/HR experts: Although the Company has a network to exchange opinions and employee surveys are conducted among employees, it is not clear if these inform a due diligence process. Surveys on the supply chain seem to refer to monitoring compliance. [2021 Sustainability Report, 03/2022: mazda.com] • Not Met: Triggered by new circumstances • Not Met: Describes risks identified
B.2.2	Assessing human rights risks and impacts	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Describe process for assessment of HR risks and discloses salient HR issues: It is not clear the process the Company has for assessing its human rights risks. This description includes how relevant factors are taken into account, such as geographical, economic, social and other factors. No further evidence found. [2021 Sustainability Report, 03/2022: mazda.com] • Not Met: How process applies to supply chain • Not Met: Public disclosure of the results of HR assessment <p>Score 2</p> <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	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Action Plans to mitigate risks: The Company indicates that 'Mazda carries out various initiatives to eliminate human rights violations. In case a problem involving human rights violations occurs, the Company discloses the case on the intranet as an example of disciplinary action, and conducts educational and awareness raising activities in order to prevent a recurrence. Mazda records the results of handling these cases and manages in accordance with the stipulated procedure, and reports to the Human Rights Committee. These records are used to formulate more effective Companywide policies and to prevent the recurrence of similar problems'. However, no further description found of a global system to prevent, mitigate or remediate its salient human rights issues. The current evidence seems to refer to corrective action plans following human right violation. [2021 Sustainability Report, 03/2022: mazda.com] • Not Met: Description of how global system applies to supply chain: Regarding its Questionnaire Survey for Suppliers, it indicates: 'After analyzing these results, the Company held individual hearings with companies deemed to be in need of further improvement, in order to offer them cooperation in devising improvement methods'. However, no further description found of its global system, to prevent, mitigate or remediate its salient human rights issues applies to its supply chain. [2021 Sustainability Report, 03/2022: mazda.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not Met: Example of actions decided on at least 1 salient HR issues Score 2 <ul style="list-style-type: none"> • Not Met: Meets all requirements under score 1 • Not Met: Involve stakeholders in decisions about actions
B.2.4	Tracking the effectiveness of actions to respond to human rights risks and impacts	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: System for tracking or monitor if actions taken are effective: Regarding its initiatives to prevent human rights violations: 'Mazda records the results of handling these cases [in case a problem involving human rights violations occurs] and manages in accordance with the stipulated procedure, and reports to the Human Rights Committee. These records are used to formulate more effective Companywide policies and to prevent the recurrence of similar problems'. However, no further description found of its system for tracking or monitoring the actions taken in response to human rights risks and impacts and for evaluating whether the actions have been effective or have missed key issues or not produced the desired results. [2021 Sustainability Report, 03/2022: mazda.com] Score 2 <ul style="list-style-type: none"> • Not Met: Lessons learnt from checking system effectiveness • Not Met: Meets both requirements under score 1 • Not Met: Involve stakeholders in evaluation of actions taken
B.2.5	Communicating on human rights impacts	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Provides two examples of comms with stakeholders Score 2 <ul style="list-style-type: none"> • Not Met: Describe challenges to effective comms and how it is working to address them

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.1	Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Channel accessible to all workers: The Company states that it 'has established the Mazda Global Hotline, as an in-house system to receive reports regarding non-compliance and other issues. With its contact points set up both inside the Company and outside (attorney's office), the hotline enables Mazda Group employees to choose a contact point to submit their reports to either under their real names or anonymously'. [2019 CSR Report, 11/2019: mazda.com] Score 2 <ul style="list-style-type: none"> • Not Met: Channel is available in all appropriate languages and workers aware: The Company indicates: 'As part of its efforts to make the hotline better known to everyone, Mazda puts up posters and implements e-learning programs'. However, it is not clear the channel is available in all appropriate languages. [2021 Sustainability Report, 03/2022: mazda.com] • Not Met: Describe how workers in the supply chain have access to grievance mechanism: It also indicates: 'The Mazda Global Hotline is also introduced to suppliers so that they can report the questions arose from any transaction'. However, it is not clear suppliers' employees can file complaints in relation to suppliers' behaviour. The Company has provided additional comments to CHRB regarding this indicator. However, evidence was not material, as they disclosed the 'Breakdown of Human Rights Consultations'. [2021 Sustainability Report, 03/2022: mazda.com] • 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 Score 2 <ul style="list-style-type: none"> • Not Met: Describes accessibility and local languages and stakeholder awareness • Not Met: Communities access mechanism direct or through suppliers • Not Met: Expect supplier to convey expectation to their own suppliers
C.3	Users are involved in the design and performance of the	0.5	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

Indicator Code	Indicator name	Score (out of 2)	Explanation
	channel(s)/mechanism(s)		<p>Score 2</p> <ul style="list-style-type: none"> • Met: Engages with potential or actual users on the improvement of the mechanism: The Company states it 'conducted a questionnaire survey and hearing of local suppliers, regarding the way the Human Rights Counselling Desk was being managed. Also, presented the management method of the Mazda Global Hotline to local suppliers'. Counselling desks are managed by the human resources office and investigates cases received 'investigate all the facts through working in collaboration with related divisions/departments, in sufficient consideration to the intention of the employees who have requested consultations'. [2019 CSR Report, 11/2019: mazda.com] • 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	<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: Response timescales and how complainants will be informed • Not Met: Describe support (technical, financial, etc) available for equal access by complainants <p>Score 2</p> <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: Regarding its systems for promoting human rights, the Company indicates: 'Serious human rights violations identified through the network are reported to executive officers and other management-level members of Mazda Motor Corporation, providing a framework that enables the implementation of Group-wide solutions'. However, it is not clear how complaints or concerns for workers and all external individuals and communities may be escalated to more senior levels or independent third party adjudicators or mediators to challenge the process or outcome. Escalation should be at the option of the complainant. [2021 Sustainability Report, 03/2022: mazda.com]
C.5	Prohibition of retaliation for raising complaints or concerns	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Public statement prohibiting retaliation: Regarding reports of non-compliance received, it indicates: 'The content of these reports is carefully handled, and the whistleblowers' confidentiality is completely protected. In so doing, Mazda takes sufficient follow-up measures to ensure that those who make reports to the hotline or who cooperate in an investigation will not be subject to unfavorable treatment'. However, no formal commitment prohibiting retaliation against workers and other stakeholders found. [2021 Sustainability Report, 03/2022: mazda.com] • Not Met: Practical measures to prevent retaliation: The Company states 'The content of these reports is carefully handled, and the whistleblowers' confidentiality is completely protected. In so doing, Mazda takes sufficient follow-up measures to ensure that those who make reports to the hotline or who cooperate in an investigation will not be subject to unfavorable treatment'. However, no evidence found of measures in place to prevent retaliation. [2019 CSR Report, 11/2019: mazda.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Company indicate it will not retaliate against workers/stakeholders • Not Met: Expects suppliers to prohibit retaliation against workers/stakeholders
C.6	Company involvement with state-based judicial and non-judicial grievance mechanisms	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Complainants not asked to waive rights • Not Met: Company does not require confidentiality provisions <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Will work with state based non judicial mechanisms • Not Met: Example of issue resolved (if applicable)
C.7	Remedying adverse impacts	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Describes how remedy has been provided • Not Met: Says how it would provide remedy for victims if no adverse impact identified <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Changes to systems, processes and practices to stop similar impact: The Company indicates: 'Mazda carries out various initiatives to eliminate human rights violations. In case a problem involving human rights violations occurs, the Company discloses the case on the intranet as an example of disciplinary action, and conducts educational and awareness raising activities in order to prevent a

Indicator Code	Indicator name	Score (out of 2)	Explanation
			recurrence. Mazda records the results of handling these cases and manages in accordance with the stipulated procedure, and reports to the Human Rights Committee. These records are used to formulate more effective Companywide policies and to prevent the recurrence of similar problems'. However, no further description found of changes to systems, processes and practices to prevent similar adverse impacts in the future. [2021 Sustainability Report, 03/2022: mazda.com] <ul style="list-style-type: none"> • 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	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Number grievances filed, addressed or resolved and outcome achieved: The 2021 Sustainability Report indicates: 'The hotline received a total of 53 reports, including consultation, in FY March 2021. The major contents of the reports were about harassment and other labor-related problems, working hours management, and suspected violations of the Mazda working regulations. Of all the reports received, 28 were regarding Mazda, 24 were regarding Group companies, and one was regarding an unknown company'. It also discloses the Breakdown of Human Rights Consultations (FY March 2021): 'Harassment 15; Human relationships in the workplace 8; Other 4; Total 27'. It adds that these consultations are 'Non-consolidated'. However, although it discloses the latter breakdown, it is not clear the number of grievances about human rights issues filed, addressed or resolved and outcomes achieved for its own workers, for external individuals and communities. [2021 Sustainability Report, 03/2022: mazda.com] • Not Met: How lessons from mechanism improve management system Score 2 <ul style="list-style-type: none"> • Not Met: Evaluation of the channel/mechanism and changes made as result: Also: 'In FY March 2021, in response to the amendment to the Whistleblower Protection Act, Mazda started reviews of its relevant regulations and the operating procedures of the persons in charge of contact points'. However, it is not clear the process it has in place to review the effectiveness of the grievance mechanism and any changes made to improve it based on the review. [2021 Sustainability Report, 03/2022: mazda.com] • Not Met: Describes procedures to address delays of outcomes agreed with stakeholders

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

D.5 Automotive Manufacturing

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.5.1.a	Living wage (in own production or manufacturing operations)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Pays living wage or sets target date: It indicates: 'In wage determination, Mazda is not only in compliance with local laws and regulations in each region both in Japan and overseas, but also taking industry standards into consideration'. However, it is not clear the Company has a time bound target for paying all workers a living wage or that it pays all workers a living wage. A living wage should include basic needs plus some discretionary for employees and his/her family and/or depends. [2021 Sustainability Report, 03/2022: mazda.com] • Not Met: Describes how living wage determined Score 2 <ul style="list-style-type: none"> • Not Met: Paying living wage • Not Met: Definition of living wage reviewed with unions
D.5.1.b	Living wage (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Discloses living wage requirements in supplier code or contracts: The Supplier CSR Guidelines indicates: 'We respect regulation in each country and region regarding financial compensation, such as minimum wage, overtime work, payroll deduction, and piece wage'. The CRS Guidelines indicates: 'We ask our suppliers to familiarize themselves with the aims of the updated Guidelines, continue promoting actions in each company to discharge their CSR'. However, it is not clear the Company expects suppliers to commit to the principles set out at the guide or that they are part of the Company's contractual arrangements. Moreover, it is not clear it has a timebound target for requiring its suppliers to pay all workers a living wage or that the company includes requirements to pay workers a living wage in its contractual arrangements with its suppliers or its supplier code of conduct. A living wage should cover basic needs and provide some discretionary for employees and his/her family and or depends. [Supplier CSR Guidelines, 12/2018: mazda.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not Met: Improving living wage practices of suppliers Score 2 <ul style="list-style-type: none"> • Not Met: Assessment of number affected by payment below living wage • Not Met: Provides analysis of trends demonstrating progress
D.5.2	Aligning purchasing decisions with human rights	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Avoids business model pressure on HRs (purchasing practices): The Company indicates: 'Mazda will, in the fullest sense of coexistence and mutual prosperity, engage in research and production for improved competitiveness. The Company will build open and fair business relationships to ensure sustainable growth and raise its level of contributions for social and economic development'. However, it is not clear the practices it adopts to avoid price or short notice requirements or other business considerations undermining human rights. [2021 Sustainability Report, 03/2022: mazda.com] Score 2 <ul style="list-style-type: none"> • Not Met: Practices adopted to pay suppliers in line with agreed timeframes • Not Met: Review own operations to mitigate negative impact Score 1 <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.5.3	Mapping and disclosing the supply chain	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Identifies direct and indirect suppliers back to manufacturing sites (factories or fields): The Company states that in 31/03/2021 it had 1.061 suppliers, being 534 of automotive parts, 144 of materials and 383 of equipment and tools. However, no further evidence found it identifies its suppliers, including direct and indirect suppliers. [2021 Sustainability Report, 03/2022: mazda.com] Score 2 <ul style="list-style-type: none"> • Not Met: Discloses names and locations of significant parts of SP and why • Not Met: Discloses which direct or indirect suppliers is involved in higher-risk activities
D.5.4.a	Prohibition of child labour: Age verification and corrective actions (in own production or manufacturing operations)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Does not use child labour: It indicates: 'Mazda is committed to make far-reaching efforts at home and abroad in compliance with national and regional regulations, including labor laws such as the prohibition of child labor'. However, this document refers to supply chain, and therefore it is not clear if the commitment refers to compliance in supply chain or own operations. [Supplier CSR Guidelines, 12/2018: mazda.com] Score 2 <ul style="list-style-type: none"> • Not Met: Age verification of workers recruited • Not Met: Remediation if children identified
D.5.4.b	Prohibition of child labour: Age verification and corrective actions (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Child Labour rules in codes or contracts: The Company states that 'We never tolerate child labor under legal employment age in each country and region'. The CRS Guidelines indicates: 'We ask our suppliers to familiarize themselves with the aims of the updated Guidelines, continue promoting actions in each company to discharge their CSR'. However, it is not clear the Company expects suppliers to commit to the principles set out at the guide or that they are part of the Company's contractual arrangements. Moreover, there is no evidence regarding verifying the age of workers recruited, and remediation programmes, within its contractual arrangements with its suppliers or supplier code of conduct. [Supplier CSR Guidelines, 12/2018: mazda.com] Score 2 <ul style="list-style-type: none"> • Not Met: How working with suppliers on child labour • Not Met: Assessment of number affected by child labour in supply chain • Not Met: Analysis of trends in progress made
D.5.5.a	Prohibition of forced labour: Recruitment fees and costs (in own production or manufacturing operations)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Job seekers and workers do not pay recruitment fee • Not Met: Commits to fully reimbursing if they have paid Score 2 <ul style="list-style-type: none"> • Not Met: How practices are implemented and monitored for agencies, labour brokers or recruiters

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.5.5.b	Prohibition of forced labour: Recruitment fees and costs (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: Debt and fees rules in codes or contracts: The Supplier CSR Guidelines indicates its prohibition of forced labor: 'We never impose forced labor, and ensure that all work shall be voluntary and employees shall be free to terminate their employment'. The CRS Guidelines indicates: 'We ask our suppliers to familiarize themselves with the aims of the updated Guidelines, continue promoting actions in each company to discharge their CSR'. However, it is not clear the Company expects suppliers to commit to the principles set out at the guide or that they are part of the Company's contractual arrangements. Moreover, it is not clear the Company prohibits suppliers and any third-party recruitment intermediaries from imposing financial burdens on job seekers and workers by collecting recruitment fees or related costs. No further evidence found. [Supplier CSR Guidelines, 12/2018: mazda.com] • Not Met: How working with suppliers on debt & fees <p>Score 2</p> <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.5.5.c	Prohibition of forced labour: Wage practices (in own production or manufacturing operations)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Pays workers in full and on time • Not Met: Payslips show any legitimate deductions <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: How these practices are monitored for agencies, labour brokers or recruiters
D.5.5.d	Prohibition of forced labour: Wage practices (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: Requirement for suppliers to pay workers in full and on time in codes or contracts: The Supplier CSR Guidelines indicates its prohibition of forced labor: 'We never impose forced labor, and ensure that all work shall be voluntary and employees shall be free to terminate their employment'. Also 'We respect regulation in each country and region regarding financial compensation, such as minimum wage, overtime work, payroll deduction, and piece wage'. The CRS Guidelines indicates: 'We ask our suppliers to familiarize themselves with the aims of the updated Guidelines, continue promoting actions in each company to discharge their CSR'. However, it is not clear the Company expects suppliers to commit to the principles set out at the guide or that they are part of the Company's contractual arrangements. Moreover, it is not clear the Company requires suppliers to pay workers in full and on time. [Supplier CSR Guidelines, 12/2018: mazda.com] • Not Met: How working with supply chain to pay workers regularly and on time <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of the number affected by failure to pay directly • Not Met: Provides analysis of trends demonstrating progress
D.5.5.e	Prohibition of forced labour: Restrictions on workers (in own production or manufacturing operations)	0	<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: Does not retain documents or restrict movement <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: How these practices are monitored for agencies, labour brokers or recruiters
D.5.5.f	Prohibition of forced labour: Restrictions on workers (in the supply chain)	0	<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: Free movement rules in codes or contracts: The Supplier CSR Guidelines indicates its prohibition of forced labor: 'We never impose forced labor, and ensure that all work shall be voluntary and employees shall be free to terminate their employment'. It also indicates that: 'We ask our suppliers to familiarize themselves with the aims of the updated Guidelines, continue promoting actions in each company to discharge their CSR'. However, it is not clear the Company expects suppliers to commit to the principles set out at the guide or that they are part of the Company's contractual arrangements. Moreover, it is not clear the Company prohibits suppliers from retaining workers' personal documents or restricting workers' freedom of movement or requiring workers to use company provided accommodation. [Supplier CSR Guidelines, 12/2018: mazda.com] • Not Met: How working with suppliers on free movement

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of the number affected by retaining docs or restricting movement • Not Met: Provides analysis of trends demonstrating progress
D.5.6.a	Freedom of association and collective bargaining (in own production or manufacturing operations)	2	<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: Commits not to interfere with union rights / Steps to avoid intimidation or retaliation: The Company indicates: 'Mazda has a standing labor agreement with the Mazda Workers' Union. The Company build relationships in which everyone thinks and works together with the Union to build environment contributing to all stakeholders. The Company and the Union held discussion on such themes as personnel affairs, production and sales once or twice a month'. Also, 'Membership is around 90% of Mazda employees'. The significant percentage of workers covered by collective bargaining agreements is taken as a proxy for not intimidating or retaliating in practice. [2021 Sustainability Report, 03/2022: mazda.com] • Met: Discloses % total direct operations covered by collective CB agreements: As it is mentioned above, 'Membership [of Mazda Workers' Union] is around 90% of Mazda employees'. [2021 Sustainability Report, 03/2022: mazda.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Meets both requirements under score 1: See above.
D.5.6.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"> • Not Met: FoA & CB rules in codes or contracts: The Company states that 'We maintain sincere dialogue with employee representatives and/or with employees. We recognize and respect the right of employees to freedom of association or non-association under the legislations in each country and region'. The CRS Guidelines indicates: 'We ask our suppliers to familiarize themselves with the aims of the updated Guidelines, continue promoting actions in each company to discharge their CSR'. However, it is not clear the Company expects suppliers to commit to the principles set out at the guide or that they are part of the Company's contractual arrangements. Moreover, no evidence found regarding freedom of association and the collective bargaining where those rights are not guaranteed by law. In cases where the Company refers to local law, evidence is needed of equivalent worker bodies, parallel mechanisms, etc. [Supplier CSR Guidelines, 12/2018: mazda.com] • 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.5.7.a	Health and safety: Fatalities, lost days, injury, occupational disease rates (in own production of manufacturing operations)	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Describes process to identify H&S risks and impacts: It indicates: 'Mazda implements voluntary and continuous safety and hygiene management through its occupational safety and health management system with the aim of reducing the potential risks for work-related accidents, enhancing overall levels of safety and hygiene standards, and achieving the industry's lowest-level workplace accident occurrence in Japan. (...) Since 2019, Mazda has established a system to carry out audits focusing on risks that may easily lead to a serious accident, thereby improving the performance of its occupational safety and health management system. Risk Assessments Mazda conducts risk assessments in all divisions, including manufacturing, product development, administration and office operations, to identify and evaluate the potential risks of disasters, diseases and fire and implement appropriate countermeasures. Through these efforts the Company reviews and identifies risks each year, improving the level of workplace safety. Moreover, Mazda has established a system under which, when chemical substances and/or machinery equipment are newly introduced, the division in charge of procurement identifies the possible risk source in advance and takes appropriate measures and then communicates the information to the division that uses these substances or equipment. Particularly regarding chemical substances, since FY March 2020, the Company has introduced a system to create a database of Safety Data Sheets (SDSs) for management of these substances so as to implement risk assessment and provide information in a reliable manner'. [2021 Sustainability Report, 03/2022: mazda.com] • Met: Injury Rate or Lost days or Near Miss disclosures for last reporting period: The Company's lost-time injury frequency rate in 2021 was 0.07. [2021 Sustainability Report, 03/2022: mazda.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not Met: Discloses Fatalities for last reporting period: The Company discloses figures regarding traffic fatalities. However, it is not clear the fatalities within its workforce for last reporting period. [2021 Sustainability Report, 03/2022: mazda.com] • Not Met: Occupational disease rate for last reporting period Score 2 • Not Met: Set targets for H&S performance: The Company indicates its occupational safety and health: 'Promote activities based on the Safety and Health Management System. Continue to conduct risk assessment and improvement activities based on the assessment results. Continue system auditing and share best practices with the related divisions. Achieve Japan's lowest-level workplace accident occurrence ratio, and consolidate the results of workplace accident occurrence surveys of Group companies on a global basis'. However, no set targets related to injury rates or lost days (or near miss frequency rate) and fatalities and occupational disease rates for the last reporting period found. [2021 Sustainability Report, 03/2022: mazda.com] • Not Met: Met targets or explain why not or what is doing to improve management systems: The Company also discloses the results of its targets: 'Surveyed/identified dangerous or hazardous factors and then conducted activities to remove/reduce these factors, resulting in a 76% reduction in high-risk factors. Conducted system auditing in all the targeted divisions, and shared the auditing results (improvements and best practices) with related divisions. Total injury frequency rate: 0.32 (decreased by 0.11 points from 2019 and ranked 5th among 14 JAMA companies). Consolidated the results of workplace accident occurrence surveys of Group companies (production sites)'. However, no set targets specifically related to injury rates or lost days (or near miss frequency rate) and fatalities and occupational disease rates for the last reporting period were found. The Company is expected to disclose whether it met these specific targets or not, as well as to explain why these were not met or how it works to improve its health and safety management systems. [2021 Sustainability Report, 03/2022: mazda.com]
D.5.7.b	Health and safety: Fatalities, lost days, injury, occupational disease rates (in the supply chain)	0	<p>The individual elements of the assessment are met or not as follows: Score 1</p> <ul style="list-style-type: none"> • Not Met: Sets out clear Health and Safety requirements: The Supplier CSR Guidelines indicates: 'We place top priority on safety and health of our employees in their workplace, and strive to prevent accidents and hazards'. It also notes: 'We ask our suppliers to familiarize themselves with the aims of the updated Guidelines, continue promoting actions in each company to discharge their CSR'. However, it is not clear the Company expects suppliers to commit to the principles set out at the guide or that they are part of the Company's contractual arrangements. Moreover, no evidence found of clear health and safety requirements. [Supplier CSR Guidelines, 12/2018: mazda.com] • Not Met: Injury rate disclosures and lost days (or near miss disclosures) for the last reporting period • Not Met: Fatalities disclosures for last reporting period • Not Met: Occupational disease rates for the last reporting period Score 2 • 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: Provide analysis of trends in progress made

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.5.8.a	Women's rights (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"> • Met: Process to stop harassment and violence against women: The 2019 CSR Report states that it 'established the Guidelines on Eliminating Sexual Harassment in 1999 and the Rules to Eliminate Human Rights Violations in 2000, prohibiting any activity that may infringe on an employee's human rights, and created a list of rules and guidelines to ensure a good working environment. [...] The most recent revisions were made in compliance with the revised Equal Employment Opportunity Law for Men and Women and the revised Child Care and Family Care Leave Act, both of which came into effect in January 2017. Specifically, in 2017, Mazda revised the Rules to Eliminate Human Rights Violations and formulated the Guidelines to Eliminate Human Rights Violations. In these rules and guidelines, the Company stipulates that inappropriate behavior regarding respect for the human rights of sexual minority or LGBT people, or pregnancy, childbirth, childcare or elderly care leave, constitutes harassment and violates Mazda working regulations. These revised rules and guidelines have been posted on the Company's Intranet, to make them known to everyone in Mazda'. Moreover, according to its 2021 Sustainability Report, it has a 'Female Employee Counseling Desk'. [2019 CSR Report, 11/2019: mazda.com] & [2021 Sustainability Report, 03/2022: mazda.com] • Not Met: Working conditions take account of gender: See above. It also indicates: 'Increasing the Employment and Range of Opportunities for Female Employees Through enhancement of measures promoting work-life balance and other initiatives, Mazda is striving to cultivate a workplace in which women can work comfortably'. However, no further details found in relation to how it takes into account differential impacts on women and men working conditions, including reproductive health. [2019 CSR Report, 11/2019: mazda.com] & [2021 Sustainability Report, 03/2022: mazda.com] • Not Met: Measures and steps to address gender pay gap at all levels of employment: The 2021 Sustainability Report indicates: 'In 2016, the Company established its targets in the general employer action plan, based on the Act of Promotion of Women's Participation and Advancement in the Workplace. Due to ongoing efforts to promote the active participation of women, the number of female managers has been steadily rising (FY March 2021 results: 52, about 2.5 times the number in FY March 2014). To further accelerate these efforts, Mazda has set new targets for FY March 2022 and onward. In this manner, initiatives are under way to further strengthen the support for female participation'. Moreover, 'Mazda has put in place a system to ensure that each employee understands their work evaluation results and ability level assessments, and feels that their growth and performance are appropriately reflected in their compensation. Specifically, since 2003, instead of using gender, age, nationality, or years of service as criteria, employees are graded according to their ability level (production and medical staff) and work level (administrative and engineering staff), so that individual employee's performances are directly reflected in their base salaries and bonuses'. Additionally, 'Through enhancement of measures promoting work-life balance and other initiatives, Mazda is striving to cultivate a workplace in which women can work comfortably. In 2021, based on the Act of Promotion of Women's Participation and Advancement in the Workplace, and the Act on Advancement of Measures to Support Raising Next-Generation Children, the Company set the goals of increasing the number of female managers to 80 by the end of FY March 2026 and increasing the number of male employees taking child-rearing leave to 80 by the end of FY March 2026, and it submitted business owner's action plans to the authority concerned. In the future, Mazda will continue to draw up and implement individual development plans for female candidates for middle and above management positions and also further promote the opportunities for female employees, by improving training and promoting female employee recruitment'. However, no further description found of how it measures and takes steps to address any gender pay gap throughout all levels of employment. [2021 Sustainability Report, 03/2022: mazda.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meet all requirements under score 1 • Not Met: Provides analysis of trends demonstrating closing gender pay gap
D.5.8.b	Women's rights (in the supply chain)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Women's rights in codes or contracts • Not Met: How working with suppliers on women's rights

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment on the number affected by discrimination or unsafe working conditions • Not Met: Provide analysis of trends in progress made
D.5.9.a	Working hours (in own production or manufacturing operations)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Respects max hours, min breaks and rest periods in its own operations • Not Met: Assesses ability to comply with its commitments when allocating work/targets <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets both requirements under score 1 • Not Met: How it implements and checks this in its operations: The Company states that it employs a 'Go Home Early Campaign: By streamlining operations, the Company has reduced the long working hours for divisions not directly connected with production. Examples of this initiative include no-overtime days and setting mandatory lights-out times. (Information about the overtime hours is reported back to management of each division, once in three months to implement the PDCA cycle.)'. However, no evidence found of measures in relation to manufacturing operations. [2021 Sustainability Report, 03/2022: mazda.com]
D.5.9.b	Working hours (in the supply chain)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Working hours in codes or contracts: The Company states that 'We comply with regulations in each country and region for employees' work hours (including overtime), holidays, annual paid leaves and others'. The CRS Guidelines also notes: 'We ask our suppliers to familiarize themselves with the aims of the updated Guidelines, continue promoting actions in each company to discharge their CSR'. However, it is not clear the Company expects suppliers to commit to the principles set out at the guide or that they are part of the Company's contractual arrangements. Moreover, no evidence found regarding working hours meeting the ILO standards (or establishing maximum working hours for regular working week and minimum breaks), as it focus in country regulations, which can vary significantly between different countries. [Supplier CSR Guidelines, 12/2018: mazda.com] • Not Met: How working with suppliers on working hours <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of number affected by excessive working hours • Not Met: Provide analysis of trends in progress made: The Company states 'In FY March 2019, a questionnaire survey was carried out about compliance (fair business practices) and labor practices (reform of working practices), in view of the growing social awareness of these matters. The survey was targeted at approximately 60 local manufacturers, a major percentage of whose sales consisted of products delivered to Mazda. The survey results showed that a progress has been made since FY March 2018.' However, no evidence was found regarding analysis of working hours for suppliers. No further evidence found. [2019 CSR Report, 11/2019: mazda.com]
D.5.10.a	Responsible Mineral Sourcing: Arrangements with suppliers and smelters/refiners in the mineral resource supply chains	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Due diligence in accordance with OECD Guidance in supplier contracts: The Company states that 'Non-use of conflict minerals and other raw materials that may cause social issues: We stay on top of the issue of raw materials that contribute to inhumane acts and take appropriate actions to avoid using such materials' and details that 'Ex. Conflict Minerals: Minerals and their derivative metals designated by Financial Regulatory Reform Article 1502 that are sourced from and used as financial source of armed groups in the Democratic Republic of Congo or the surrounding countries (Regulated minerals: tantalum, tin, tungsten, gold)'. The CRS Guidelines also notes: 'We ask our suppliers to familiarize themselves with the aims of the updated Guidelines, continue promoting actions in each company to discharge their CSR'. However, it is not clear the Company expects suppliers to commit to the principles set out at the guide or that they are part of the Company's contractual arrangements. Moreover, no evidence found regarding the requirement of a due diligence in accordance with OECD standards, and this being contractual. [Supplier CSR Guidelines, 12/2018: mazda.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not Met: Works with smelters/refiners and suppliers to build capacity: The Company states that 'In FY March 2021, Mazda conducted a survey on conflict minerals, targeting about 300 suppliers of the parts and materials of vehicles to be supplied to companies to which Mazda vehicles are delivered, in response to the request. The survey was carried out using the format designated by the Electronic Industry Citizenship Coalition (EICC) (now the Responsible Business Alliance [RBA])'. However, no evidence found regarding contribution to building suppliers and smelters/refiners capacity in risk assessment and improving their due diligence performance. [2021 Sustainability Report, 03/2022: mazda.com] Score 2 <ul style="list-style-type: none"> • Not Met: Contractual requirement to disclosure smelter/refiner information • Not Met: Contractual requirement covers all minerals
D.5.10.b	Responsible Mineral Sourcing: Risk identification in mineral supply chain	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Risk identification and disclosure in line with OECD Guidance: The Company states that 'In FY March 2021, Mazda conducted a survey on conflict minerals, targeting about 300 suppliers of the parts and materials of vehicles to be supplied to companies to which Mazda vehicles are delivered, in response to the request. The survey was carried out using the format designated by the Electronic Industry Citizenship Coalition (EICC) (now the Responsible Business Alliance [RBA])'. However, no further description found of its processes for identifying and prioritising risks and impacts in its supply chain as set out in the OECD Guidance and discloses the risks identified with respect to at least 3TG. [2021 Sustainability Report, 03/2022: mazda.com] • Not Met: Identification of smelter/refiners and OECD Guidance: Although the Company indicates that conducted a survey targeting about 300 suppliers, not clear if it managed to identify all smelters and refiners in the supply chain and whether they conduct due diligence following OECD Guide Score 2 <ul style="list-style-type: none"> • Not Met: Discloses smelters/refiners judged in line with OECD Guidance • Not Met: Risk identification and disclosure covers all minerals
D.5.10.c	Responsible Mineral Sourcing: Risk management in the mineral supply chain	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Describes mineral risk management plan for supply chain • Not Met: Monitoring, tracking and whether better risk prevention/mitigation over time • Not Met: Disclose better risk prevention/mitigation over time Score 2 <ul style="list-style-type: none"> • Not Met: Suppliers and stakeholders engaged in risk management strategy • Not Met: Risk management and response processes cover all minerals
D.5.11	Responsible Materials Sourcing	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Due diligence for raw materials in supplier code/contracts: The Company states in its Supplier CSR Guidelines: 'Non-use of conflict minerals and other raw materials that may cause social issues We stay on top of the issue of raw materials that contribute to inhumane acts and take appropriate actions to avoid using such materials.' In addition, it indicates in its Sustainability Report: 'To ensure that conflict minerals and other materials that may cause social problems are not used, the Mazda Supplier CSR Guidelines clearly state Mazda's policy, and the Company requires all suppliers to comply with it.' However, no evidence found of requirements to carry out due diligence (and this being contractual). [Supplier CSR Guidelines, 12/2018: mazda.com] & [2019 CSR Report, 11/2019: mazda.com] Score 2 <ul style="list-style-type: none"> • Not Met: Works with suppliers to build capacity in risk assessment and due diligence • Not Met: Meets all requirements under score 1 • Not Met: Identify the sources of high-risk raw materials in its supply chain

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
E(1).0	Serious allegation No 1		No allegations meeting the CHRB severity threshold were found, and so the score of 5.61 out of 80 points scored in themes A-D has been applied to produce a score of 1.40 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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