

Company Name McCormick
Industry Agricultural Products (Supply Chain only)
Overall Score 9.2 out of 100

Theme Score	Out of	For Theme
0.3	10	A. Governance and Policies
0.5	25	B. Embedding Respect and Human Rights Due Diligence
4.5	20	C. Remedies and Grievance Mechanisms
2.1	25	D. Performance: Company Human Rights Practices
1.8	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	<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: General HRs commitment: It indicates that 'As a member of the UN Global Compact, we commit to implement universal sustainability principles that meet fundamental responsibilities in the areas of human rights, labor, environment, and anti-corruption'. However, no commitment to respect human rights found. 'Commit to implement universal sustainability principles' is not considered a formal statement of commitment to human rights according to CHRB wording criteria. [Human Rights Policy, N/A: mccormickcorporation.com] • Not Met: Universal Declaration of Human rights (UDHR) • Not Met: International Bill of Human Rights <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Commitment to the UNGPs • 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	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Company has a commitment to the ILO Core: It indicates that 'the standards set forth in this Policy align with basic working conditions and human rights concepts advanced by international organizations such as the International Labor Organization'. However, no direct commitment found to the ILO Declaration/the human rights that the ILO has declared to be fundamental rights at work. [Human Rights Policy, N/A: mccormickcorporation.com] • Not Met: Company has an explicit commitment to All four ILO Core: Its Human Rights Policy covers: Prohibiting Forced Labour and Child Labour, Non-discrimination and Harassment. It also indicates that 'McCormick respects our employees' right to individually decide to join or to refrain from joining any lawful

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>organization. The Company is committed to complying with laws pertaining to freedom of association, (...) and collective bargaining'. However, it is not clear whether it is committed to respect these rights in all contexts and locations (i.e. alternative mechanisms for those countries where there are legal restrictions to the exercise of these rights), as the Company indicates that it respects these rights 'complying with laws'. [Human Rights Policy, N/A: mccormickcorporation.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Company expect suppliers to commit to ILO Core • Not Met: Company explicitly list All four ILO for suppliers: The Global Supplier Code of Conduct address on its 'Business Conduct Standards': child labour, forced labour, Non-Discrimination in hiring and employment. The code also states that 'suppliers shall recognize and respect the right of employees to freedom of association and collective bargaining'. [Supplier Code of Conduct, 06/04/2021: d1e3z2jco40k3v.cloudfront.net]
A.1.2.b	Commitment to respect the human rights of workers: Health and safety and working hours	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Commitment to respect H&S of workers: It indicates that 'McCormick is committed to providing employees with a safe and healthy work environment'. [Human Rights Policy, N/A: mccormickcorporation.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"> • Met: Expect suppliers to commit to H&S of their workers: It indicates that 'Supplier shall provide employees with safe and healthy working conditions'. [Supplier Code of Conduct, 06/04/2021: d1e3z2jco40k3v.cloudfront.net] • Not Met: Expect suppliers to commit to ILO labour standard or to 48 hours regular work week: It indicates that 'Supplier's employees will work in compliance with all applicable laws pertaining to the number of hours and days worked. Employees will be provided with reasonable daily and weekly work schedules, and adequate allowance will be made for time off'. 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, 06/04/2021: d1e3z2jco40k3v.cloudfront.net]
A.1.3.a.AG	Commitment to respect human rights particularly relevant to the industry – land, natural resources and indigenous peoples' rights (AG)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Respect land ownership and natural resources as set out in VGGT • Not Met: Respect land ownership and natural resources as set out in The IFC Performance Standards • Not Met: Respecting indigenous peoples' rights or ILO Convention No.169 or UN Declaration • Not Met: Expecting suppliers to make these commitments <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Respecting the right to water • Not Met: Company's policy commits to obtain FPIC: It indicates that 'McCormick is committed to supporting the economic and social development of the communities where its agricultural suppliers operate (...). One of the most impactful ways that we can do this is by working to improve the livelihoods of farmers and to set the expectation that agricultural producers in our supply chain will respect the rights of communities and traditional peoples to their land and natural resources'. However, no commitment to respecting land ownership and natural resources as set out in the IFC Performance Standards or VGGT found. Neither was it found an expectation of commitment to respecting indigenous peoples' rights. [Sustainable Agriculture Policy, 03/2021: d1e3z2jco40k3v.cloudfront.net] • Not Met: Expecting suppliers to make these commitments : The supplier code states that 'Supplier shall provide employees with safe and healthy working conditions. At a minimum, potable drinking water, clean restrooms'. However, no further details found, including whether it expects its supplier to obtain the free prior and informed consent (FPIC) from indigenous peoples and local communities for transaction(s) involving land and natural resources or to a zero tolerance for land grabbing. [Supplier Code of Conduct, 06/04/2021: d1e3z2jco40k3v.cloudfront.net]
A.1.3.b.AG	Commitment to respect human rights particularly	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Women's rights • Not Met: Children's rights • Not Met: Migrant worker's rights

Indicator Code	Indicator name	Score (out of 2)	Explanation
	relevant to the industry – vulnerable groups (AG)		<ul style="list-style-type: none"> • Not Met: Expects suppliers to respect at least one of these rights: It indicates that ‘All agricultural suppliers to McCormick are required to abide by local, national and international laws and regulations regarding the treatment of workers directly employed on farms or indirectly employed through labor contractors or brokers. These requirements governing the treatment of workers apply without exception to all workers, including migrant laborers’. However, it is not clear the Company expects suppliers to respect the rights of migrant workers. Alternatively, it could expect suppliers to respect the rights of women or child. No further evidence found. [Sustainable Agriculture Policy, 03/2021: d1e3z2jco40k3v.cloudfront.net] Score 2 • 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 [Purpose Led Performance Report 2019, 26/03/2020: p.widencdn.net] & [Global Supplier Code, 17/06/2019: d1e3z2jco40k3v.cloudfront.net]
A.1.4	Commitment to remedy	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: The Company commits to remedy • Met: Company expect suppliers to make this commitment: The Supplier Code states that they 'shall conduct internal audits and/or risk assessments to ensure it is adhering to the following standards [include human rights] and shall devise and implement a remediation plan to address any deficiencies'. [Supplier Code of Conduct, 06/04/2021: d1e3z2jco40k3v.cloudfront.net] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Collaborating with other remedy initiatives • Not Met: Work with suppliers to remedy impact
A.1.5	Commitment to respect the rights of human rights defenders	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Zero tolerance attacks on HRs Defenders (HRDs) • Not Met: Company expect suppliers to make this commitment <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Work with HRD to create safe and enabling environment

A.2 Policy Commitments (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.2.1	Commitment from the top	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Board level responsibility for HRs: The Company mentions its ethics and compliance program is overseen by the Board of Directors and the Audit Committee, however, no evidence found that the program includes human rights related topics. [Purpose Led Performance Report 2019, 26/03/2020: p.widencdn.net] • Not Met: Describe HR expertise of Board member <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Speeches/letters by Board members or CEO
A.2.2	Board responsibility	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Board/Committee review HRs strategy • Not Met: Examples/trends re HR discussion in the last reporting period <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets both requirements under score 1 • Not Met: How affected stakeholders/HR experts informed discussions
A.2.3	Incentives and performance management	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Incentives for at least one board member • Not Met: At least one key HR risk, beyond employee H&S <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Performance criteria made public • Not Met: Review of other board performance criteria
A.2.4	Business model strategy and risks	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Board process to review bussiness model and strategy • Not Met: Describe frequency and triggers for reviewing <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets both requirements under score 1 • Not Met: Example of actions decided

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

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.1	Responsibility and resources for day-to-day human rights functions	0	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 • Not Met: Senior responsibility for HR implementation and decision making Score 2 <ul style="list-style-type: none"> • Not Met: How it assigns Day-to-day responsibility • Not Met: Day-to-day resources and expertise allocation in own ops • Not Met: Resources and expertise allocation in the supply chain
B.1.2	Incentives and performance management	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Senior manager incentives for human rights • Not Met: At least one key HR risk, beyond employee H&S Score 2 <ul style="list-style-type: none"> • Not Met: Performance criteria made public • Not Met: Review of other senior management performance
B.1.3	Integration with enterprise risk management	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: HR risks is integrated as part of enterprise risk system • Not Met: Provides an example Score 2 <ul style="list-style-type: none"> • Not Met: Audit Ctte or independent risk assessment
B.1.4.a	Communication /dissemination of policy commitment(s) to workers and external stakeholders	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Score of 1 on A.1.2.a • Not Met: Communicates its policy to all workers in own operations Score 2 <ul style="list-style-type: none"> • Not Met: Communication of policy commitments to stakeholder • Not Met: How policy commitments are made accessible to audience
B.1.4.b	Communication /dissemination of policy commitment(s) to business relationships	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Meets ILO requirement for suppliers on A.1.2.a • Not Met: Steps to communicate policy commitments to supply chain • Not Met: Requires suppliers to communicate policy requirements: The Company reports: 'Supplier is responsible for ensuring compliance with this Code of Conduct by all of its suppliers that provide materials or services in the manufacture, processing, and/or production of products provided by Supplier to McCormick. McCormick may conduct such audits and inspections of Supplier's records in respect of its suppliers. McCormick expects Suppliers to apply similar standards to their own suppliers and subcontractors by communicating the expectations contained in this Code of Conduct and holding them accountable as well.' Also, it states: 'McCormick's Supplier Code of Conduct applies to all Suppliers, Vendors, Contractors, Consultants, Agents and other providers of goods and services (collectively "Supplier") who wish to conduct business with McCormick entities worldwide'. However, no further evidences indicating how the communication is done to direct suppliers. [Global Supplier Code, 17/06/2019: d1e3z2jco40k3v.cloudfront.net] Score 2 <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	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Scores at least 1 on A.1.2.a • Not Met: How workers are trained on HR policy commitments • Not Met: Trains relevant managers including procurement Score 2 <ul style="list-style-type: none"> • Not Met: Score of 2 on A.1.2.a • Not Met: Meets both requirements under score 1 • Not Met: Trains suppliers to meet company's HR commitment • Not Met: Disclose % trained
B.1.6	Monitoring and corrective actions	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Scores at least 1 on A.1.2.a

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not Met: Monitoring implementation of HR policy commitments across global ops and supply chain • Not Met: Proportion of supply chain monitored • Not Met: Describe how workers are involved in monitoring Score 2 <ul style="list-style-type: none"> • Not Met: Score of 2 on A.1.2.a • Not Met: Describes corrective action process • Not Met: Disclose findings and number of corrective action
B.1.7	Engaging and terminating business relationships	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: HR affects selection of suppliers • Met: HR affects on-going supplier relationships: The Global Supplier Code of Conduct (Code) clarifies the global expectations in the areas of business integrity, human rights, health and safety and environmental management, it states that " McCormick also reserves the right to terminate the relationship with any Supplier and/or Facility that does not comply with this Code of Conduct." [Global Supplier Code, 17/06/2019: d1e3z2jco40k3v.cloudfront.net] Score 2 <ul style="list-style-type: none"> • Not Met: Describe positive incentives offered to respect human rights • Not Met: Working with suppliers to meet HR requirements
B.1.8	Approach to engagement with affected stakeholders	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Stakeholder process or systems to identify and engage with workers/communities in the last two years • Not Met: Discloses stakeholders that HRs may be affected • Not Met: Provides two examples of engagement with stakeholders Score 2 <ul style="list-style-type: none"> • Not Met: Analysis of stakeholder views on company's HR issues • Not Met: Describe how views influenced company's HR approach

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.1	Identifying human rights risks and impacts	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Identifying risks in own operations • Not Met: Identifying risks through relevant business relationships Score 2 <ul style="list-style-type: none"> • Not Met: Describe ongoing global risk identification in consultation with stakeholder/HR experts • Not Met: Triggered by new circumstances • Not Met: Describes risks identified
B.2.2	Assessing human rights risks and impacts	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Describe process for assessment of HR risks and discloses salient HR issues • Not Met: How process applies to supply chain • Not Met: Public disclosure of the results of HR assessment Score 2 <ul style="list-style-type: none"> • Not Met: Meets all requirements under score 1 • Not Met: How it involved affected stakeholders in the assessment
B.2.3	Integrating and acting on human rights risks and impact assessments	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Action Plans to mitigate risks • Not Met: Description of how global system applies to supply chain • Not Met: Example of actions decided on at least 1 salient HR issues Score 2 <ul style="list-style-type: none"> • Not Met: Meets all requirements under score 1 • Not Met: Involve stakeholders in decisions about actions
B.2.4	Tracking the effectiveness of actions to respond to human rights risks and impacts	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: System for tracking or monitor if actions taken are effective • Not Met: Lessons learnt from checking system effectiveness Score 2 <ul style="list-style-type: none"> • Not Met: Meets both requirements under score 1 • Not Met: Involve stakeholders in evaluation of actions taken

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: Score 1 • Not Met: Provides two examples of comms with stakeholders Score 2 • 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	2	The individual elements of the assessment are met or not as follows: Score 1 • Met: Channel accessible to all workers: The Company states that possesses a hotline for grievance as it is indicated in "Our supervisory and management employees are also expected to adhere to and promote our "open door" policy. This means that they are available to anyone with ethical or other concerns, questions or complaints. We also maintain a confidential "hotline" that we can call in those circumstances, the details of which are set out at the end of this policy. All concerns, questions and complaints will be taken seriously and handled promptly, confidentially and professionally" [Business ethics policy, N/A: mccormickcorporation.com] Score 2 • Met: Channel is available in all appropriate languages and workers aware: The company makes its hotline available in the following countries: Australia, Canada, Cayman Islands, China, El Salvador, France, Guadeloupe, India, Italy, La Reunion, Martinique, Mexico, Netherlands, Poland, Portugal, Romania, Russia, Singapore, South Africa, Spain, Switzerland, Thailand, Turkey, UK, Ukraine, United Arab Emirates, United Kingdom and USA. It claims that "the Service is available in nearly all languages". [EthicsPoint, N/A: secure.ethicspoint.com] • Met: Describe how workers in the supply chain have access to grievance mechanism: The Company requires its suppliers to "establish an effective, confidential grievance process to ensure that any worker, acting individually or with other workers, can submit a grievance without suffering any prejudice or retaliation of any kind. The grievance process shall include an appeals process for workers who disagree with how a grievance is resolved. Grievance mechanisms shall be available in the worker's native language and include the ability to report grievances anonymously." [Supplier Code of Conduct, 06/04/2021: d1e3z2jco40k3v.cloudfront.net] • Met: Expect Suppliers to convey expectation to their own suppliers: The Company indicates that every "Supplier is responsible for ensuring compliance with this Code of Conduct by all of its suppliers that provide materials or services in the manufacture, processing, and/or production of products provided by Supplier to McCormick. McCormick may conduct such audits and inspections of Supplier's records in respect of its suppliers. McCormick expects Suppliers to apply similar standards to their own suppliers and subcontractors by communicating the expectations contained in this Code of Conduct and holding them accountable as well. This includes contract and seasonal workers and temporary agencies." [Supplier Code of Conduct, 06/04/2021: d1e3z2jco40k3v.cloudfront.net]
C.2	Grievance channel(s)/mechanism(s) to receive complaints or concerns from external individuals and communities	1.5	The individual elements of the assessment are met or not as follows: Score 1 • Met: Grievance mechanism for community: The company's EthicsPoint is available to: Employees, Former Employees, Customers, Contractors, Vendor/Suppliers, Others. [EthicsPoint, N/A: secure.ethicspoint.com] Score 2 • Not Met: Describes accessibility and local languages and stakeholder awareness: The company makes its hotline available in the following countries: Australia, Canada, Cayman Islands, China, El Salvador, France, Guadeloupe, India, Italy, La Reunion, Martinique, Mexico, Netherlands, Poland, Portugal, Romania, Russia, Singapore, South Africa, Spain, Switzerland, Thailand, Turkey, UK, Ukraine, United Arab Emirates, United Kingdom and USA. However, it remains unclear how the company ensures awareness among local communities and other stakeholders. [EthicsPoint, N/A: secure.ethicspoint.com] • Met: Communities access mechanism direct or through suppliers: Communities can access EthicsPoint directly on the company's website. [EthicsPoint, N/A: secure.ethicspoint.com] • Not Met: Expect supplier to convey expectation to their own suppliers
C.3	Users are involved in the	0	The individual elements of the assessment are met or not as follows: Score 1 • Not Met: Engages users to create or assess system

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	design and performance of the channel(s)/mechanism(s)		<ul style="list-style-type: none"> • Not Met: Examples (at least two) of how they do this Score 2 <ul style="list-style-type: none"> • Not Met: Engages with potential or actual users on the improvement of the mechanism • Not Met: Provides user engagement example (at least two) on improvement
C.4	Procedures related to the mechanism(s)/channel(s) are equitable, publicly available and explained	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Response timescales and how complainants will be informed: The company says "When you submit the report, you will be issued a Report Key. Please write it down and keep it in a safe place. 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 5-6 business days. By returning in 5-6 business days, you will have the opportunity to review any Follow-up Questions or submit more information about this incident." [EthicsPoint, N/A: secure.ethicspoint.com] • Not Met: Describe support (technical, financial,etc) available for equal access by complainants: The company states "Reports are entered directly on the EthicsPoint secure server to prevent any possible breach in security. NAVEX Global makes these reports available only to specific individuals within the company who are charged with evaluating the report, based on the type of violation and location of the incident. Each of these report recipients has had training in keeping these reports in the utmost confidence." However, none of the above describes means of support made available to ensure the complainants are equipped to equally participate in the process. [FAQ Ethic Point, N/A: secure.ethicspoint.com] Score 2 <ul style="list-style-type: none"> • Not Met: Describe types of outcome to complainant through use of mechanism • Not Met: Escalation to senior/independent level: According to the Business ethics policy the Company states that they can "share the report with the following individuals: The Chief Executive Officer, Chief Financial Officer, Chief Accounting Officer, and Chief Corporate Human Relations Officer of McCormick - The Chief Executive responsible for McCormick's European operations, the Chief Financial Officer for Europe, the Chief Human Relations Officer for Europe, and The Chief Executive Officer, Chief Financial Officer, Chief Human Relation Officer and in-house counsel of the appropriate McCormick affiliate or subsidiary." However, no further information was found regarding escalating to reach a final decision. [Business ethics policy, N/A: mccormickcorporation.com]
C.5	Prohibition of retaliation for raising complaints or concerns	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Public statement prohibiting retaliation: The company says: "If you report potential misconduct in good faith, McCormick and the appropriate McCormick affiliate or subsidiary will not take any retaliatory action against you for making the report, even if the investigation determines that the report is groundless." [Business ethics policy, N/A: mccormickcorporation.com] • Not Met: Practical measures to prevent retaliation Score 2 <ul style="list-style-type: none"> • Met: Company indicate it will not retaliate against workers/stakeholders: The company states: "All concerns, questions and complaints will be taken seriously and handled promptly, confidentially and professionally. No retaliation will be taken against any employee for raising any concern, question or complaint in good faith." [Business ethics policy, N/A: mccormickcorporation.com] • Met: Expects suppliers to prohibit retaliation against workers/stakeholders: The company says: "Supplier will establish an effective, confidential grievance process to ensure that any worker, acting individually or with other workers, can submit a grievance without suffering any prejudice or retaliation of any kind." [Supplier Code of Conduct, 06/04/2021: d1e3z2jco40k3v.cloudfront.net]
C.6	Company involvement with state-based judicial and non-judicial grievance mechanisms	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Complainants not asked to waive rights • Not Met: Company does not require confidentiality provisions Score 2 <ul style="list-style-type: none"> • Not Met: Will work with state based non judicial mechanisms • Not Met: Example of issue resolved (if applicable)
C.7	Remedying adverse impacts	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Describes how remedy has been provided

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			<ul style="list-style-type: none"> • Not Met: Says how it would provide remedy for victims if no adverse impact identified Score 2 <ul style="list-style-type: none"> • Not Met: Changes to systems, processes and practices to stop similar impact • Not Met: Describe approach to monitoring implementation of agreed remedy • Not Met: Approach to learning from incident to prevent future impacts
C.8	Communication on the effectiveness of grievance mechanism(s) and incorporating lessons learned	0	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 • 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 • Not Met: Describes procedures to address delays of outcomes agreed with stakeholders

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.1.1.b	Living wage (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Discloses timebound target for suppliers to pay living wage or include in code or contracts: In its Supplier Code, the Company states that " Employees will be fairly compensated and provided with wages and benefits that comply with applicable laws, including appropriate compensation for overtime work and other premium pay situations required by applicable law." No further information regarding living wage is mentioned. [Global Supplier Code, 17/06/2019: d1e3z2jco40k3v.cloudfront.net] Score 2 <ul style="list-style-type: none"> • Not Met: Improving living wage practices of suppliers • Not Met: Assessment of number affected by payment below living wage • Not Met: Provides analysis of trends demonstrating progress
D.1.2	Aligning purchasing decisions with human rights	0	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) • Not Met: Practices adopted to pay suppliers in line with agreed timeframes • Not Met: Review own operations to mitigate negative impact Score 2 <ul style="list-style-type: none"> • Not Met: Meets all requirements under score 1 • Not Met: Examples of how it assessed, addressed and change purchasing practices
D.1.3	Mapping and disclosing the supply chain	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) 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.1.4.b	Prohibition of child labour: Age verification and corrective actions (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Child Labour rules in codes or contracts: In its Supplier Code, the Company states that "Child labor is strictly prohibited. Suppliers shall adhere to the minimum employment legal age limit defined by national law or regulation, and comply with relevant International Labor Organization (ILO) standards. In no instance shall a supplier permit children to perform work that exposes them to undue physical risks than can cause physical, mental or emotional harm or improperly interfere with their schooling (except as may be permitted under apprenticeship or similar programs in which the minor is lawfully participating)." However, the Company does not indicate that it verifies the age of job applicants. [Global Supplier Code, 17/06/2019: d1e3z2jco40k3v.cloudfront.net] Score 2 <ul style="list-style-type: none"> • Not Met: How working with suppliers on child labour • Not Met: Assesment of number affected by child labour in supply chain • Not Met: Analysis of trends in progress made

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.1.5.b	Prohibition of forced labour: Recruitment fees and costs (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Debt and fees rules in codes or contracts • Not Met: How working with suppliers on debt & fees Score 2 <ul style="list-style-type: none"> • Not Met: Assessment of the number affected by payment of recruitment fees • Not Met: Analysis of trends in progress made
D.1.5.d	Prohibition of forced labour: Wage practices (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Suppliers to pay workers in full and on time in codes or contracts • Not Met: How working with supply chain to pay workers regularly and on time Score 2 <ul style="list-style-type: none"> • Not Met: Assessment of the number affected by failure to pay directly • Not Met: Provides analysis of trends demonstrating progress
D.1.5.f	Prohibition of forced labour: Restrictions on workers (in the supply chain)	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Free movement rules in codes or contracts: In its Supplier Code, the Company states that "Supplier confirms that, in providing goods and services to McCormick, it has not used involuntary or forced labor, whether indentured, bonded, prison or otherwise, and that the Supplier has not confiscated or withheld worker identity documents or other valuable items, including passports, work permits and travel documentation. Supplier certifies that it has not been, and is not, keeping workers' personal documents as a means to bind them to employment or to restrict their freedom of movement". [Global Supplier Code, 17/06/2019: d1e3z2jco40k3v.cloudfront.net] • Not Met: How working with suppliers on free movement Score 2 <ul style="list-style-type: none"> • Not Met: Assessment of the number affected by retaining docs or restricting movement • Not Met: Provides analysis of trends demonstrating progress
D.1.6.b	Freedom of association and collective bargaining (in the supply chain)	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: FoA & CB rules in codes or contracts: Company states: "Suppliers shall recognize and respect the right of employees to freedom of association and collective bargaining." [Supplier Code of Conduct, 06/04/2021: d1e3z2jco40k3v.cloudfront.net] • Not Met: How working with suppliers on FoA and CB Score 2 <ul style="list-style-type: none"> • Not Met: Assessment of the number affected by restrictions to FoA and CB in the SP • Not Met: Provides analysis of trends demonstrating progress
D.1.7.b	Health and safety: Fatalities, lost days, injury, occupational disease rates (in the supply chain)	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Sets out clear Health and Safety requirements: In its Global Supplier Code, the Company states that "Vendor shall provide employees with safe and healthy working conditions. At a minimum, potable drinking water, clean restrooms, adequate ventilation, fire exits and essential safety equipment, an emergency aid kit, access to emergency medical care and appropriately lit work stations are provided. The Vendor's facilities are to be constructed and maintained in accordance with applicable law." [Global Supplier Code, 17/06/2019: d1e3z2jco40k3v.cloudfront.net] • Met: Injury Rate or Lost days or Near miss disclosures for last reporting period: The company registered 0.24 (LTIs per 200,000 hours) in the year 2021 for Lost Time Injury rate. [Purpose Led Performance Report 2021, 2021: mccormick.widen.net] • Met: Fatalities rate for lasting reporting period: The company recorded zero fatalities in 2021. [Purpose Led Performance Report 2021, 2021: mccormick.widen.net] • Met: Occupation disease rate for last reporting period: The company marked the occupational illness frequency rate as 0. [Purpose Led Performance Report 2021, 2021: mccormick.widen.net] Score 2 <ul style="list-style-type: none"> • Not Met: How working with suppliers on H&S • Not Met: Assessment of the number affected by H&S issues in the SP • Not Met: Provides analysis of trends demonstrating progress

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.1.8.b	Land rights: Land acquisition (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: Rules on land & owners in codes or contracts • Not Met: How working with suppliers on land issues Score 2 <ul style="list-style-type: none"> • Not Met: Includes resettlement requirements that the supplier provides financial compensation • Not Met: Assessment of the number affected by land rights issues in its SP • Not Met: Provides analysis of trends demonstrating progress
D.1.9.b	Water and sanitation (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Rules on water stewardship in codes or contracts • Not Met: How working with suppliers on water stewardship issues Score 2 <ul style="list-style-type: none"> • Not Met: Assessment on the number affected by lack of access to water and sanitation • Not Met: Provides analysis of trends demonstrating progress
D.1.10.b	Women's rights (in the supply chain)	0	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 in codes or contracts: Although the Company indicates: 'Responsible sourcing includes fully recognizing the fundamental, though often hidden, role women play on farms across our global supply chain', there is no evidence indicating women's right requests for its suppliers. [Sustainable Sourcing, N/A: mccormickcorporation.com] Score 2 <ul style="list-style-type: none"> • Not Met: How working with suppliers on women's rights • Not Met: Assessment on the number affected by discrimination or unsafe working conditions • Not Met: Provides analysis of trends demonstrating progress

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
E(1).0	Serious allegation No 1		No allegations meeting the CHRB severity threshold were found, and so the score of 7.35 out of 80 points scored in themes A-D has been applied to produce a score of 1.84 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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