

**Company Name** Seven & I Holdings  
**Industry** Agricultural Products (Supply Chain only)  
**Overall Score** 8.4 out of 100

Theme Score	Out of	For Theme
2.0	10	A. Governance and Policies
1.8	25	B. Embedding Respect and Human Rights Due Diligence
2.0	20	C. Remedies and Grievance Mechanisms
0.8	25	D. Performance: Company Human Rights Practices
1.7	20	E. Performance: Responses to Serious Allegations

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

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

## Detailed assessment

### A. Governance and Policies (10% of Total)

#### A.1 Policy Commitments (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1.1	Commitment to respect human rights	2	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Met: International Bill of Human Rights: The Human Rights policy states that 'We understand and support the following internationally recognized principles and standards as the minimum principles and standards to be observed with regard to human rights. The International Bill of Human Rights'. [Human Rights Policy, 7/10/2021: <a href="https://7andi.com">7andi.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Not Met: Commitment to the UNGPs</li> <li>Met: Commitment to the OECD Guidelines for Multinational Enterprises: The Company indicates: 'We understand and support the following internationally recognized principles and standards as the minimum principles and standards to be observed with regard to human rights. (...) The OECD Guidelines for Multinational Enterprises'. [Human Rights Policy, 7/10/2021: <a href="https://7andi.com">7andi.com</a>]</li> </ul>
A.1.2.a	Commitment to respect the human rights of workers: ILO Declaration on Fundamental Principles and Rights at Work	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Met: Company has a commitment to the ILO Core: The Company indicates: 'We understand and support the following internationally recognized principles and standards as the minimum principles and standards to be observed with regard to human rights. (...) The ILO Declaration on Fundamental Principles and Rights at Work'. [Human Rights Policy, 7/10/2021: <a href="https://7andi.com">7andi.com</a>]</li> <li>Not Met: Company has an explicit commitment to All four ILO Core: The Company's Human Rights policy covers: Prohibition of forced labour, Prohibition of child labour, Prohibition of discrimination. However, no reference to the rights to freedom of association or collective bargaining found. [Human Rights Policy, 7/10/2021: <a href="https://7andi.com">7andi.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Company expect suppliers to commit to ILO Core: The Business Partner Action Guidelines indicate that 'International declarations such as [...] "International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work" shall be respected'. Regarding its Business Partner Action Guidelines, the Company indicates: 'we are requesting our business partners and their suppliers to develop their systems to ensure that they comply with the Guidelines'. [Business Partner Action Guidelines, 02/2020: <a href="http://7andi.com">7andi.com</a>]</li> <li>• Not Met: Company explicitly list All four ILO for suppliers: The Business Partner Action Guidelines covers: No Child Labour and Protection for Young Workers, No Forced Labour, Elimination of Abuse, Harassment, Discrimination and Punishment. Regarding the rights to freedom of association or collective bargaining it indicates 'It shall be ensured that workers may organize a labour union and become a member of a labour union at their discretion subject to local laws. (...) An employer, labour union and representative of workers shall freely discuss issues to reach a satisfactory agreement for all of them and create an employer-employee relationship that works properly'. However, it is not clear whether the Company requires to respect those rights in all contexts, as it indicates 'subject to local laws'. In these cases (companies referring to local laws in freedom of association and collective bargaining), companies are expected to require alternative mechanisms or equivalent workers bodies where the right to freedom of association and collective bargaining is restricted under law. Previous assessment used evidence from the webpage section 'Business Partners Action Guideline', which has been updated and the website section Supporting the Active Role of Women, Youth and Seniors across the Group and Society, which CHRB no longer considers a suitable source for policy statements. The latest version on the website section Business Partners Action Guideline no longer contains previous piece of evidence. [Business Partner Action Guidelines, 02/2020: <a href="http://7andi.com">7andi.com</a>]</li> </ul>
A.1.2.b	Commitment to respect the human rights of workers: Health and safety and working hours	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Commitment to respect H&amp;S of workers: The Company discloses that strives to maintain workers health and safety by measures to prevent industrial accidents and ensure that workers are able to work in good health, both physically and mentally. Seven &amp; I Holdings adopts a mechanism to protect itself against infection, prevents mental health disorders, and provides education and support to promote good health. The HR Policy adds that 'we provide a safe, hygienic, and healthy working environment in accordance with laws and regulations'. [Code of Corporate Conduct, 6/09/2016: <a href="http://7andi.com">7andi.com</a>] &amp; [Human Rights Policy, 7/10/2021: <a href="http://7andi.com">7andi.com</a>]</li> <li>• Not Met: Respect ILO labour standards on working hours or Commits to 48 hours regular work week: It indicates that: 'We appropriately manage working hours, holidays, and vacations in accordance with laws and regulations'. However, no evidence found of the Company explicitly committing to respect ILO conventions on working hours or that publicly states that workers are not required to work more than 48 hours as regular working week, and that overtime is consensual and paid at a premium rate. [Human Rights Policy, 7/10/2021: <a href="http://7andi.com">7andi.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Expect suppliers to commit to H&amp;S of their workers: The Business Partners Guidelines states that 'All individuals engaged in business activities shall be employed in a proper manner in a sanitary, functional, challenging and humane work environment inconsideration of human rights protection, safety and health'. Regarding its Business Partner Action Guidelines, the Company indicates: 'we are requesting our business partners and their suppliers to develop their systems to ensure that they comply with the Guidelines'. [Business Partner Action Guidelines, 02/2020: <a href="http://7andi.com">7andi.com</a>]</li> <li>• Not Met: Expect suppliers to commit to ILO labour standard or to 48 hours regular work week: The Business Partners Guidelines: 'Labour hours, break time and holidays shall be subject to the provisions of applicable local laws or standards set forth by the industry, whichever is more advantageous to workers. Overtime work shall not be required without a worker's consent. Efforts shall be made to achieve the standards of working hours based on the International Labour Organization's (ILO) recommendation. ILO "Reduction of Hours of Work Recommendation, 1962" (except for workers engaged in agriculture, shipping and ocean fishing industry). A principle of the forty-hour week shall be progressively achieved as a social standard. There shall be no reduction in the wages of the workers when the hours of work are reduced. Where the duration of the normal working week exceeds forty-eight hours, immediate steps should be taken to bring it down to a level of 48 hours. (...) Overtime work shall not be required without a worker's consent'. However, it is not clear there is a similar commitment that also</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			covers workers engaged in agriculture. Moreover, according to CHRB criteria, overtime should be paid at a premium rate. [Business Partner Action Guidelines, 02/2020: <a href="http://7andi.com">7andi.com</a> ]
A.1.3.a.AG	Commitment to respect human rights particularly relevant to the industry – land, natural resources and indigenous peoples' rights (AG)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Respect land ownership and natural resources as set out in VGGT</li> <li>• Not Met: Respect land ownership and natural resources as set out in The IFC Performance Standards</li> <li>• Not Met: Respecting indigenous peoples' rights or ILO Convention No.169 or UN Declaration</li> <li>• Not Met: Expecting suppliers to make these commitments</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Respecting the right to water</li> <li>• Not Met: Company's policy commits to obtain FPIC</li> <li>• Not Met: Expecting suppliers to make these commitments</li> </ul> : The Business Partner Action Guidelines indicates: 'Hygienic restrooms and drinking water shall be available for workers and their use during work hours shall not be restricted'. Regarding its Business Partner Action Guidelines, the Company indicates: 'we are requesting our business partners and their suppliers to develop their systems to ensure that they comply with the Guidelines'. However, it is not clear suppliers are expected to respect the right to water beyond current commitment to worker settings. No evidence found on whether suppliers are expected to commit to obtain the free prior and informed consent (FPIC). [Business Partner Action Guidelines, 02/2020: <a href="http://7andi.com">7andi.com</a> ]
A.1.3.b.AG	Commitment to respect human rights particularly relevant to the industry – vulnerable groups (AG)	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Met: Children's rights: The Company indicates: 'We understand and support the following internationally recognized principles and standards as the minimum principles and standards to be observed with regard to human rights. (...) The Children's Rights and Business Principles'. [Human Rights Policy, 7/10/2021: <a href="http://7andi.com">7andi.com</a>]</li> <li>• Not Met: Expects suppliers to respect at least one of these rights</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Met: Child Rights Convention/Business Principles: The Company indicates: 'We understand and support the following internationally recognized principles and standards as the minimum principles and standards to be observed with regard to human rights. (...) The Children's Rights and Business Principles'. [Human Rights Policy, 7/10/2021: <a href="http://7andi.com">7andi.com</a>]</li> <li>• Not Met: Expecting suppliers to respect these rights</li> </ul>
A.1.4	Commitment to remedy	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Met: The Company commits to remedy: The HR Policy states that: If it becomes clear that our business activities have caused or contributed to human rights abuse, we will work to correct and remedy the situation. Even if our business activities have not caused nor contributed to human rights abuse but if our products or services have been directly linked to the impacts through business relationships, we will encourage our business partners to correct and remedy the situation'. Also: 'We will operate grievance mechanisms appropriately, including whistleblowing systems to prevent human rights abuse and provide accesses to remedy for those who have been negatively impacted'. [Human Rights Policy, 7/10/2021: <a href="http://7andi.com">7andi.com</a>]</li> <li>• Met: Company expect suppliers to make this commitment: The Company's Business Partner Action Guidelines indicates: 'Any serious acts that constitute a violation of the Business Partner Action Guidelines, including accidents causing bodily injury, human rights abuse and non-compliance with laws shall be immediately reported to the appropriate people of each operating company of SEVEN &amp; I Group. Immediate correction and remedy provision shall be conducted in connection with such acts, and efforts shall be made to prevent the spread of damage, identify the cause and take measures to prevent any recurrence'. Regarding its Business Partner Action Guidelines, the Company indicates: 'we are requesting our business partners and their suppliers to develop their systems to ensure that they comply with the Guidelines'. [Business Partner Action Guidelines, 02/2020: <a href="http://7andi.com">7andi.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Collaborating with other remedy initiatives</li> <li>• Not Met: Work with suppliers to remedy impact</li> </ul>
A.1.5	Commitment to respect the rights of human	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Zero tolerance attacks on HRs Defenders (HRDs)</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
	rights defenders		<ul style="list-style-type: none"> <li>• Not Met: Company expect suppliers to make this commitment</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Work with HRD to create safe and enabling environment</li> </ul>

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.2.1	Commitment from the top	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Board level responsibility for HRs</li> <li>• Not Met: Describe HR expertise of Board member</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Speeches/letters by Board members or CEO</li> </ul>
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"> <li>• Not Met: Board/Committee review HRs strategy</li> <li>• Not Met: Examples/trends re HR discussion in the last reporting period</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Meets both requirements under score 1</li> <li>• Not Met: How affected stakeholders/HR experts informed discussions</li> </ul>
A.2.3	Incentives and performance management	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Incentives for at least one board member</li> <li>• Not Met: At least one key HR risk, beyond employee H&amp;S</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Performance criteria made public</li> <li>• Not Met: Review of other board performance criteria</li> </ul>
A.2.4	Business model strategy and risks	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Board process to review bussiness model and strategy</li> <li>• Not Met: Describe frequency and triggers for reviewing</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Meets both requirements under score 1</li> <li>• Not Met: Example of actions decided</li> </ul>

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

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.1	Responsibility and resources for day-to-day human rights functions	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Score of 1 on A.1.2.a: See indicator A.1.2.a</li> <li>• Not Met: Senior responsibility for HR implementation and decision making</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: How it assigns Day-to-day responsibility</li> <li>• Not Met: Day-to-day resources and expertise allocation in own ops: The Company states in its Integrated Report that 'On fronts such as environmental issues and human rights, our burden of responsibility becomes heavier the wider we cast our global net. It is, of course, the responsibility of the finance division to reinforce financial capabilities to address such issues appropriately and accurately.' However, it is not clear within allocation of resources and expertise.</li> <li>• Not Met: Resources and expertise allocation in the supply chain: The Company states in its Integrated Report that 'Various human rights issues have come up in the world today. Expectations are high for companies to fulfill their social responsibilities throughout their supply chains for the merchandise and services they provide. That means respecting and protecting human rights, complying with laws and regulations, protecting the environment, and giving consideration to working conditions. The Group places the highest priority on respecting and protecting human rights, and we ask our business partners to understand and implement the Seven &amp; I Group Business Partner Sustainable Action Guidelines.' By this conclusion, the company understands the importance of human rights in its supply chain. However is not clear about resource and expertise allocation.</li> </ul>
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"> <li>• Not Met: Senior manager incentives for human rights</li> <li>• Not Met: At least one key HR risk, beyond employee H&amp;S</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Performance criteria made public</li> <li>• Not Met: Review of other senior management performance</li> </ul>
B.1.3	Integration with enterprise risk management	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: HR risks is integrated as part of enterprise risk system: The Company indicates that 'Various human rights issues have come up in the world today. Expectations are high for companies to fulfill their social responsibilities throughout their supply chains for the merchandise and services they provide. That means respecting and protecting human rights, complying with laws and regulations, protecting the environment, and giving consideration to working conditions. The Group places the highest priority on respecting and protecting human rights, and we ask our business partners to understand and implement the Seven &amp; I Group Business Partner Sustainable Action Guidelines ("Action Guidelines"). No evidence found, however, of human rights risks being integrated as part of the enterprise risk system. Previous assessment was based on a source dated 2018, which is now out of the three-year timeframe that CHRB methodology requires.</li> <li>• Not Met: Provides an example</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Audit Ctte or independent risk assessment</li> </ul>
B.1.4.a	Communication /dissemination of policy commitment(s) to workers and external stakeholders	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Score of 1 on A.1.2.a</li> <li>• Not Met: Communicates its policy to all workers in own operations: The Company states that it 'offers various educational activities and employee training with the aim of creating a corporate culture in which everyone respects the human rights of all customers, business partners, people in local communities, and colleagues, and in which people are aware of all types of discrimination and prejudices and do not discriminate against others or tolerate such behaviour. To further support education at Group companies, we are working to promote employee understanding with our human rights awareness handbook, "Human Rights for Everyone—Let's Start by Learning," and the "Normalization Support Guide". However, it is not clear if it is communicated to all company employees, including local languages. [Company Website, Human Rights Initiative, 08/08/2019: <a href="#">7andi.com</a>] &amp; [Integrated Report, 12/01/2022: <a href="#">7andi.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Communication of policy commitments to stakeholder</li> <li>• Not Met: How policy commitments are made accessible to audience</li> </ul>
B.1.4.b	Communication /dissemination of policy commitment(s) to business relationships	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Meets ILO requirement for suppliers on A.1.2.a: See indicator A.1.2.a</li> <li>• Not Met: Steps to communicate policy commitments to supply chain: The Company indicates that 'we ask our business partners to understand and implement the Seven &amp; I Groups Business Partner Sustainable Action Guidelines'. It adds that 'when we request a new business relationship with a Group company, we ask the partner company to understand and comply with the Action Guidelines and undergo a CSR audit'. No evidence found, however, in relation to communicating policies down the supply chain. [Integrated Report, 12/01/2022: <a href="#">7andi.com</a>] &amp; [Business Partner Action Guidelines, 02/2020: <a href="#">7andi.com</a>]</li> <li>• Not Met: Requires suppliers to communicate policy requirements: See above. No evidence found of the Company requiring its suppliers to cascade policies down the supply chain. [Integrated Report, 12/01/2022: <a href="#">7andi.com</a>] &amp; [Business Partner Action Guidelines, 02/2020: <a href="#">7andi.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: How HR commitments made binding/contractual</li> <li>• Not Met: Company requires suppliers to cascade down to their suppliers</li> </ul>
B.1.5	Training on Human Rights	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Scores at least 1 on A.1.2.a: See indicator A.1.2.a</li> <li>• Met: How workers are trained on HR policy commitments: The Company states that it 'offers various educational activities and employee training with the aim of creating a corporate culture in which everyone respects the human rights of all customers, business partners, people in local communities, and colleagues, and in which people are aware of all types of discrimination and prejudices and do not discriminate against others or tolerate such behavior. To further support education at Group companies, we are working to promote employee understanding with our human rights awareness handbook, "Human Rights for Everyone—Let's Start by Learning," and the "Normalization Support Guide". [Integrated Report,</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>12/01/2022: <a href="https://www.7andi.com">7andi.com</a> &amp; [Company Website, Human Rights Initiative, 08/08/2019: <a href="https://www.7andi.com">7andi.com</a>]</p> <ul style="list-style-type: none"> <li>• Not Met: Trains relevant managers including procurement: In addition, it states that 'to reduce and mitigate human rights risks in the supply chain, we conduct compliance training for business partners and internal personnel in charge of merchandise development and procurement'. No further description found. [Integrated Report, 12/01/2022: <a href="https://www.7andi.com">7andi.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Score of 2 on A.1.2.a: See indicator A.1.2.a</li> <li>• Not Met: Meets both requirements under score 1</li> <li>• Not Met: Trains suppliers to meet company's HR commitment: The Company states in its Integrated Report that 'Furthermore, to reduce and mitigate human rights risks in the supply chain, we conduct compliance training for business partners and internal personnel in charge of merchandise development and procurement'. However, no further details found on how suppliers are trained. [Integrated Report, 12/01/2022: <a href="https://www.7andi.com">7andi.com</a>]</li> <li>• Not Met: Disclose % trained</li> </ul>
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"> <li>• Not Met: Scores at least 1 on A.1.2.a: See indicator A.1.2.a</li> <li>• Not Met: Monitoring implementation of HR policy commitments across global ops and supply chain: The Company states in its Website that visits factories, including business partners and suppliers. Managers and workers are interviewed and audits are made by an external organization. If the audit finds unacceptable items related to human rights issues, the external audit organization provides a guidance to the factory. The Company describes audits conducted on business partners and suppliers in the annual report. However, no details found in relation to how monitors human rights compliance in own operations. [Company Website, Building an Ethical Society and Improving Sustainability Together with Customers, 08/08/2019: <a href="https://www.7andi.com">7andi.com</a>] &amp; [Integrated Report, 12/01/2022: <a href="https://www.7andi.com">7andi.com</a>]</li> <li>• Not Met: Proportion of supply chain monitored</li> <li>• Not Met: Describe how workers are involved in monitoring</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Score of 2 on A.1.2.a</li> <li>• Met: Describes corrective action process: The Company discloses that the factory that receives a warning from the external organization after the audit must submit a corrective action plan to the auditing organization within 10 days of the audit being completed, and must take immediate action to remedy and improve the items. Seven &amp; I Holdings discloses that after receiving a report of changes in the system, the implementation of improvements is confirmed based on the submission of photos showing the improvements. In cases when numerous serious unacceptable items are found, there is a revisit in the factory to perform a re-audit. This is to determine whether the issues have been corrected. [Company Website, Building an Ethical Society and Improving Sustainability Together with Customers, 08/08/2019: <a href="https://www.7andi.com">7andi.com</a>] &amp; [Integrated Report, 12/01/2022: <a href="https://www.7andi.com">7andi.com</a>]</li> <li>• Met: Disclose findings and number of corrective action: The Company indicates that results of overseas CSR audits for FY2021 identified major non-conformities at 11 factories, and corrective actions have been implemented. Non-conformities related to living wage (minimum wage, eight cases) and underage workers (three cases). Inadequate wage payment records were also handled as the non-conformities relating to living wage (minimum wage). The three cases of non-conformity related to underage workers concerned failure to register underage workers with regional governments, failure to conduct health checks, and overtime work for minor tasks, for all of which corrective actions were confirmed [...] no major non-conformities were identified in the CSR audits for FY2021 conducted at the 271 factories in Japan to which we outsource the manufacture of our private-brand merchandise'. [Integrated Report, 12/01/2022: <a href="https://www.7andi.com">7andi.com</a>]</li> </ul>
B.1.7	Engaging and terminating business relationships	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: HR affects selection of suppliers: The annual report states that 'when we request a new business relationship with a Group company, we ask the partner company to understand and comply with the Action Guidelines and undergo a CSR audit. If the business partner is found to comply with the CSR audit, or to take any required corrective action, we issue a Certificate of Conformity and start business with the partner. Renewal of the Certificate of Conformity is a prerequisite for continuing business with the Group'. [Integrated Report, 12/01/2022: <a href="https://www.7andi.com">7andi.com</a>]</li> <li>• Met: HR affects on-going supplier relationships: Seven &amp; I Holdings states in its Business Partner Action Guidelines that 'transactions may be temporarily</li> </ul>

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			suspended or contracts may be terminated if any serious acts including violations of human rights and laws that cause non-compliance with the Business Partner Actions Guidelines are discovered'. [Business Partner Action Guidelines, 02/2020: <a href="http://7andi.com">7andi.com</a> ] Score 2 <ul style="list-style-type: none"> <li>• Not Met: Describe positive incentives offered to respect human rights</li> <li>• Not Met: Working with suppliers to meet HR requirements</li> </ul>
B.1.8	Approach to engagement with affected stakeholders	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Met: Stakeholder process or systems to identify and engage with workers/communities in the last two years: The Company discloses in its Stakeholder Engagement Document, that its stakeholders groups are costumers, business partners, shareholders and investors, local communities, franchisee store owners, employees and global environment. Also, describes what are the main engagement methods with each of stakeholders groups and how is made the engagement with each of them. [Stakeholders Engagement, 2020: <a href="http://7andi.com">7andi.com</a>]</li> <li>• Not Met: Discloses stakeholders that HRs may be affected</li> <li>• Not Met: Provides two examples of engagement with stakeholders</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Analysis of stakeholder views on company's HR issues</li> <li>• Met: Describe how views influenced company's HR approach</li> </ul>

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.1	Identifying human rights risks and impacts	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Identifying risks in own operations</li> <li>• Not Met: Identifying risks through relevant business relationships</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Describe ongoing global risk identification in consultation with stakeholder/HR experts</li> <li>• Not Met: Triggered by new circumstances</li> <li>• Not Met: Describes risks identified</li> </ul>
B.2.2	Assessing human rights risks and impacts	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Describe process for assessment of HR risks and discloses salient HR issues: The Company states that it 'has established a human rights due diligence mechanism in accordance with procedures set forth in the UN Guiding Principles on Business and Human Rights, and strives to prevent or mitigate any negative impact on human right'. However, no details on the risk and impacts assessment process, including how geographical, social, economic or other factors are taken into account. [Integrated Report, 12/01/2022: <a href="http://7andi.com">7andi.com</a>]</li> <li>• Not Met: How process applies to supply chain [Integrated Report, 12/01/2022: <a href="http://7andi.com">7andi.com</a>]</li> <li>• Not Met: Public disclosure of the results of HR assessment</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Meets all requirements under score 1</li> <li>• Not Met: How it involved affected stakeholders in the assessment</li> </ul>
B.2.3	Integrating and acting on human rights risks and impact assessments	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Action Plans to mitigate risks</li> <li>• Not Met: Description of how global system applies to supply chain</li> <li>• Not Met: Example of actions decided on at least 1 salient HR issues</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Meets all requirements under score 1</li> <li>• Not Met: Involve stakeholders in decisions about actions</li> </ul>
B.2.4	Tracking the effectiveness of actions to respond to human rights risks and impacts	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: System for tracking or monitor if actions taken are effective</li> <li>• Not Met: Lessons learnt from checking system effectiveness</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Meets both requirements under score 1</li> <li>• Not Met: Involve stakeholders in evaluation of actions taken</li> </ul>
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"> <li>• Not Met: Provides two examples of comms with stakeholders</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			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	1.5	The individual elements of the assessment are met or not as follows: Score 1 • Met: Channel accessible to all workers: Seven & I Holdings has a help line for its own operation and another for Business Partners. Both help lines are operated by a third party under a service contract and a non-disclosure agreement to protect the privacy of people. The consultation desk accepts reports via e-mail, telephone, or post. The system is available to all workers and it is explained how to use in employee training. [Company Website, Compliance, 08/08/2019: <a href="#">7andi.com</a> ] Score 2 • Not Met: Channel is available in all appropriate languages and workers aware • Met: Describe how workers in the supply chain have access to grievance mechanism: The Company indicates in its CSR Data Book that 'The Business Partner Helpline can be used by Directors and Audit & Supervisory Board Members, employees, and former employees of domestic Group companies' business partners. To ensure that business partners are fully aware of the helpline system and its points of contact, we explain it at briefings for business partners and distribute information in pamphlets.' [CSR Data Book 2020, 2020: <a href="#">7andi.com</a> ] & [Company Website, Compliance, 08/08/2019: <a href="#">7andi.com</a> ] • 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 • Not Met: Grievance mechanism for community Score 2 • Not Met: Describes accessibility and local languages and stakeholder awareness • Not Met: Communities access mechanism direct or through suppliers: The Company indicates that 'Seven & I Holdings has set up the Groupwide Employee Helpline, the Business Partner Helpline, and the Audit & Supervisory Board Hotline to prevent conduct that could result in loss of public credibility and to ensure early detection, early remediation, and recurrence prevention. The Groupwide Employee Helpline is for receiving reports from employees of operating companies in Japan, the Audit & Supervisory Board Hotline is for reports related to management, and the Business Partner Helpline is for reports from business partners.' However, there is no mention to how external communities of suppliers' can access to the helpline [CSR Data Book 2020, 2020: <a href="#">7andi.com</a> ] • Not Met: Expect supplier to convey expectation to their own suppliers
C.3	Users are involved in the design and performance of the channel(s)/mechanism(s)	0	The individual elements of the assessment are met or not as follows: Score 1 • Not Met: Engages users to create or assess system • Not Met: Examples (at least two) of how they do this Score 2 • Not Met: Engages with potential or actual users on the improvement of the mechanism • Not Met: Provides user engagement example (at least two) on improvement
C.4	Procedures related to the mechanism(s)/channel(s) are equitable, publicly available and explained	0	The individual elements of the assessment are met or not as follows: Score 1 • Not Met: Response timescales and how complainants will be informed: The Company indicates in its CSR Data Book that 'Once a whistleblowing is received, the company subject to the whistleblowing quickly confirms the facts, corrects any violations that are found, and strives to prevent a recurrence. To create an environment that facilitates reporting, reports can be made anonymously, and our operating regulations stipulate that whistleblowers are not to be subjected to disadvantageous treatment for having made a report. The person is contacted at the end of the month following notification of completion of the case by the third-party consultation desk to check that they have not suffered retaliation or disadvantageous treatment'. It is not clear, however, the means by which complainants will be informed and timescales for addressing the complaints (timescale refers to the month following the resolution). [CSR Data Book 2020, 2020: <a href="#">7andi.com</a> ] • Not Met: Describe support (technical, financial, etc) available for equal access by complainants Score 2 • Not Met: Describe types of outcome to complainant through use of mechanism

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Not Met: Escalation to senior/independent level: The Company states in its Website that 'in the event of a serious violation or other such incident, a report will be provided immediately to the Representative Director ... and the necessary response measures will be taken. In addition, the CSR Department reports on the operational status of the internal reporting system to Seven &amp; I Holdings' CSR Management Committee and the Board of Directors'. It is not clear, however, if complainants, including external stakeholders complainants, can escalate the complaint to challenge the outcome. [Company Website, Compliance, 08/08/2019: <a href="http://7andi.com">7andi.com</a>]</li> </ul>
C.5	Prohibition of retaliation for raising complaints or concerns	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Public statement prohibiting retaliation: The Company discloses that has two helpline to receive complaints, while one is for receiving reports from employees of Group companies in Japan, the other is for reports from business partners. Employees and business partners are bound by operating regulations not to subject whistleblowers to disadvantageous treatment for having made a report. However, there is no evidence that the hotline can be used for external stakeholders and they are free of retaliation. [Company Website, Compliance, 08/08/2019: <a href="http://7andi.com">7andi.com</a>]</li> <li>• Met: Practical measures to prevent retaliation: The Company discloses in its Website that reports can be made anonymously and call four weeks later for the person who made the complaint to ensure that none retaliation have occurred. [Company Website, Compliance, 08/08/2019: <a href="http://7andi.com">7andi.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Company indicate it will not retaliate against workers/stakeholders</li> <li>• Not Met: Expects suppliers to prohibit retaliation against workers/stakeholders</li> </ul>
C.6	Company involvement with state-based judicial and non-judicial grievance mechanisms	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Complainants not asked to waive rights</li> <li>• Not Met: Company does not require confidentiality provisions</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Will work with state based non judicial mechanisms</li> <li>• Not Met: Example of issue resolved (if applicable)</li> </ul>
C.7	Remedying adverse impacts	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Describes how remedy has been provided: The Company indicates in its Integrated Report that ' If it becomes clear that the Group's business activities are causing or contributing to human rights abuse, we work to correct or remedy the situation.' However, no further information found. [Integrated Report, 12/01/2022: <a href="http://7andi.com">7andi.com</a>]</li> <li>• Not Met: Says how it would provide remedy for victims if no adverse impact identified</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Changes to systems, processes and practices to stop similar impact</li> <li>• Not Met: Describe approach to monitoring implementation of agreed remedy</li> <li>• Not Met: Approach to learning from incident to prevent future impacts</li> </ul>
C.8	Communication on the effectiveness of grievance mechanism(s) and incorporating lessons learned	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Number grievances filed, addressed or resolved and outcome achieved: The Company discloses data provided from the third party that operates the grievances mechanism. On its website Seven &amp; I Holdings describes how many cases are related to each issue of complaint such as working hours, human relations, labour contracts and others topics. However, it is not clear how many human rights related cases were filed, addressed or closed during the year, including workers and external individuals and communities. [Company Website, Compliance, 08/08/2019: <a href="http://7andi.com">7andi.com</a>]</li> <li>• Not Met: How lessons from mechanism improve management system</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Evaluation of the channel/mechanism and changes made as result</li> <li>• Not Met: Describes procedures to address delays of outcomes agreed with stakeholders</li> </ul>

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.1.1.b	Living wage (in the supply chain)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Discloses timebound target for suppliers to pay living wage or include in code or contracts: The Company states in its Seven &amp; I Group Business Partner Sustainable Action Guide that 'Workers shall be paid minimum wage or more specified in applicable local laws.' However, no information found on timebound for suppliers to pay living wage. [Seven &amp; I Group Business Partner Sustainable Action Guide, 12/2019: <a href="http://7andi.com">7andi.com</a>]</li> <li>• Not Met: Improving living wage practices of suppliers</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Assessment of number affected by payment below living wage</li> <li>• Not Met: Provides analysis of trends demonstrating progress</li> </ul>
D.1.2	Aligning purchasing decisions with human rights	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Avoids business model pressure on HRs (purchasing practices)</li> <li>• Not Met: Practices adopted to pay suppliers in line with agreed timeframes</li> <li>• Not Met: Review own operations to mitigate negative impact</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Meets all requirements under score 1</li> <li>• Not Met: Examples of how it assessed, addressed and change purchasing practices</li> </ul>
D.1.3	Mapping and disclosing the supply chain	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Identifies direct and indirect suppliers back to manufacturing sites (factories or fields)</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Discloses names and locations of significant parts of SP and why</li> <li>• Not Met: Discloses which direct or indirect suppliers is involved in higher-risk activities</li> </ul>
D.1.4.b	Prohibition of child labour: Age verification and corrective actions (in the supply chain)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Child Labour rules in codes or contracts: The Business Partner Action Guidelines (supplier code) prohibits child labour and indicates that 'upon employment, the age of any worker shall be verified'. No details found, however, in relation to requirements to have remediation plans. [Business Partner Action Guidelines, 02/2020: <a href="http://7andi.com">7andi.com</a>]</li> <li>• Not Met: How working with suppliers on child labour</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Assessment of number affected by child labour in supply chain</li> <li>• Not Met: Analysis of trends in progress made</li> </ul>
D.1.5.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"> <li>• Not Met: Debt and fees rules in codes or contracts: The Business Partner Action Guidelines require that 'workers shall not be forced to deposit money nor provide the original documents of their identification as a deposit'. It is not clear, however, if this requirement is made extensive to any third-party recruitment intermediaries. [Business Partner Action Guidelines, 02/2020: <a href="http://7andi.com">7andi.com</a>]</li> <li>• Not Met: How working with suppliers on debt &amp; fees</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Assessment of the number affected by payment of recruitment fees</li> <li>• Not Met: Analysis of trends in progress made</li> </ul>
D.1.5.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"> <li>• Not Met: Suppliers to pay workers in full and on time in codes or contracts</li> <li>• Not Met: How working with supply chain to pay workers regularly and on time</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Assessment of the number affected by failure to pay directly</li> <li>• Not Met: Provides analysis of trends demonstrating progress</li> </ul>
D.1.5.f	Prohibition of forced labour: Restrictions on workers (in the supply chain)	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Free movement rules in codes or contracts: The Business Partners Guideline state that 'it shall be ensured that workers may leave the job of their own free will'. 'Workers shall not be forced to [...] provide the original documents of their identification as a deposit'. [Business Partner Action Guidelines, 02/2020: <a href="http://7andi.com">7andi.com</a>]</li> <li>• Not Met: How working with suppliers on free movement</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			Score 2 <ul style="list-style-type: none"> <li>• Not Met: Assessment of the number affected by retaining docs or restricting movement</li> <li>• Not Met: Provides analysis of trends demonstrating progress</li> </ul>
D.1.6.b	Freedom of association and collective bargaining (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: FoA &amp; CB rules in codes or contracts</li> <li>• Not Met: How working with suppliers on FoA and CB</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Assessment of the number affected by restrictions to FoA and CB in the SP</li> <li>• Not Met: Provides analysis of trends demonstrating progress</li> </ul>
D.1.7.b	Health and safety: Fatalities, lost days, injury, occupational disease rates (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"> <li>• Met: Sets out clear Health and Safety requirements: The Business Partners Action Guidelines (supplier code) include a number of requirements in relation to health and safety, including buildings and equipment standards, emergency exits, signs, inspections, evacuation trainings, hygienic restrooms and drinking water, material and protective equipment, chemicals, trainings, chemical handling, etc. [Seven &amp; I Group Business Partner Sustainable Action Guide, 12/2019: <a href="http://7andi.com">7andi.com</a>]</li> <li>• Not Met: Injury Rate or Lost days or Near miss disclosures for last reporting period</li> <li>• Not Met: Fatalities rate for lasting reporting period</li> <li>• Not Met: Occupation disease rate for last reporting period</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: How working with suppliers on H&amp;S</li> <li>• Not Met: Assessment of the number affected by H&amp;S issues in the SP</li> <li>• Not Met: Provides analysis of trends demonstrating progress</li> </ul>
D.1.8.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"> <li>• Not Met: Rules on land &amp; owners in codes or contracts</li> <li>• Not Met: How working with suppliers on land issues</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Includes resettlement requirements that the supplier provides financial compensation</li> <li>• Not Met: Assessment of the number affected by land rights issues in its SP</li> <li>• Not Met: Provides analysis of trends demonstrating progress</li> </ul>
D.1.9.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"> <li>• Not Met: Rules on water stewardship in codes or contracts: Although the Company states in its Business Partners Guideline that 'hygienic restrooms and drinking water shall be available for workers and their use during work hours shall not be restricted', there is no reference about safe water to external uses, such as communities around the Company and suppliers operations. [Seven &amp; I Group Business Partner Sustainable Action Guide, 12/2019: <a href="http://7andi.com">7andi.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: How working with suppliers on water stewardship issues</li> <li>• Not Met: Assessment on the number affected by lack of access to water and sanitation</li> <li>• Not Met: Provides analysis of trends demonstrating progress</li> </ul>
D.1.10.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"> <li>• Not Met: Women's rights in codes or contracts</li> <li>• Not Met: How working with suppliers on women's rights</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Assessment on the number affected by discrimination or unsafe working conditions</li> <li>• Not Met: Provides analysis of trends demonstrating progress</li> </ul>

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
E(1).0	Serious allegation No 1		No allegations meeting the CHRB severity threshold were found, and so the score of 6.68 out of 80 points scored in themes A-D has been applied to produce a score of 1.67 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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