

Company Name Suntory
Industry Agricultural Products (Supply Chain only)
Overall Score 27.5 out of 100

Theme Score	Out of	For Theme
2.0	10	A. Governance and Policies
13.2	25	B. Embedding Respect and Human Rights Due Diligence
5.5	20	C. Remedies and Grievance Mechanisms
1.3	25	D. Performance: Company Human Rights Practices
5.5	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"> Met: Universal Declaration of Human rights (UDHR): The Company states that 'the Suntory Group respects international standards of conduct and fully respect the United Nations (UN) Universal Declaration of Human Rights, OECD Guidelines for Multinational Enterprises, and ILO Tripartite declaration of principles concerning multinational enterprises and social policy and ILO Declaration on Fundamental Principles and Rights at Work'. [Human Rights Policy, 10/07/2019: suntory.com] Score 2 <ul style="list-style-type: none"> Not Met: Commitment to the UNGPs: This datapoint was previously assessed as Met based on the Company's Sustainability Report. However, it is not longer a suitable source for policy statements under CHRB's revised approach. Met: Commitment to the OECD Guidelines for Multinational Enterprises: See above. The Company states that it 'fully respects' the OECD Guidelines for MNEs [Human Rights Policy, 10/07/2019: suntory.com]
A.1.2.a	Commitment to respect the human rights of workers: ILO Declaration on Fundamental Principles and Rights at Work	1.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Met: Company has a commitment to the ILO Core: The Company's Code of Business Ethics covers each ILO Core commitment: discrimination, forced labour, child labour, freedom of association and collective bargaining, as indicated below. [Code of Business Ethics on web, N/A: suntory.com] Met: Company has a explicit commitment to All four ILO Core: The Code of Business Ethics covers: discrimination, child and forced labour. It also indicates: 'We respect employees' basic rights to freedom of association and collective bargaining'. [Code of Business Ethics on web, N/A: suntory.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> • Met: Company expect suppliers to commit to ILO Core: In its Basic Policy on Sustainable Procurement, the Company indicates: ‘as stated in our Human Rights Policy, we require our suppliers to understand and comply with the ILO Tripartite declaration of principles concerning multinational enterprises and social policy and ILO Declaration on Fundamental Principles and Rights at Work. We expect compliance through the voluntary efforts of our suppliers, even if the ILO principles are not adequately protected by local law’. [Basic Policy on Supply Chain Sustainability (web), N/A: suntory.com] • Not Met: Company explicitly list All four ILO for suppliers: The Code of Business Ethics covers: discrimination, child and forced labour. It also indicates: 'We respect employees' basic rights to freedom of association and collective bargaining'. The Code also explains: ‘We also strive to encourage business partners of our Group Companies to understand and respect the provisions set out in this Code’. However, it is not clear if they are required to respect these provisions, as the Company 'strives to encourage'. [Code of Business Ethics on web, N/A: suntory.com]
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: 'We create healthy, safe, and positive workplaces, and promote working styles that offer work-life balance'. [Code of Business Ethics on web, N/A: suntory.com] • Not Met: Respect ILO labour standards on working hours or Commits to 48 hours regular work week: The Company indicates, in its webpage section Promoting Work-Life Balance: ‘We have set a goal of total working hours of 1,899 hours or less (*) by curbing long working hours and promoting the acquisition of annual paid leave [...] The above goal is an average of 39 hours per week (5 days), which is aligned with the ILO standard of 48 hours per week’. It also indicates that ‘ We also support and respect the 10 principles of the UN Global Compact as a Global Compact signatory company. [...] ILO Tripartite declaration of principles concerning multinational enterprises and social policy and ILO Declaration on Fundamental Principles and Rights at Work’. However, although the Company indicates it has stabilised a working hours goal and that it acknowledges the ILO Tripartite declaration, 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. Commitments are expected to be placed in formal policy documents. The Company has provided an additional source to this indicator, however, no material evidence was found. [Promoting Work-Life Balance (web), N/A: suntory.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Expect suppliers to commit to H&S of their workers: The Suntory Group Supplier Guidelines ‘provide the basic principles that suppliers of the Suntory Group (hereinafter called “Suppliers”) shall respect’. It specifies the ‘Business Conduct Principles’. It requires that 'suppliers must have a health & safety policy, identify any hazards in the workplace, manage them and communicate any potential dangers to the employees'. [Supplier Guidelines, 01/2022: suntory.com] • Not Met: Expect suppliers to commit to ILO labour standard or to 48 hours regular work week: The Suntory Group Supplier Guidelines ‘provide the basic principles that suppliers of the Suntory Group (hereinafter called “Suppliers”) shall respect’. It specifies the ‘Business Conduct Principles’. It indicates that: ‘Working hours must comply with all local laws and regulations, ILO standards and/or collective agreements’. 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. The Company has provided an additional source to this indicator, however, no material evidence was found, as the source only mentioned work hours in relation to its risk assessment. [Supplier Guidelines, 01/2022: suntory.com] & [Respect for Human Rights (web), N/A: suntory.com]
A.1.3.a.AG	Commitment to respect human rights particularly relevant to the industry – land, natural resources and	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: Respect land ownership and natural resources as set out in VGGT: The webpage section Respect for Human Rights indicates that: 'We also consider it crucial to protect land tenure, water access rights, and the rights of indigenous peoples. We will therefore promote human rights due diligence taking into account global frameworks such as the Voluntary Guidelines on the Responsible Governance of Tenure of Land, Fisheries and Forests in the Context of National Food Security (VGGT) [...]’. However, ‘consider it crucial to protect’ is not

Indicator Code	Indicator name	Score (out of 2)	Explanation
	indigenous peoples' rights (AG)		<p>considered a formal statement of commitment according to CHRB wording criteria. No policy statement found committing it to respect ownership/use of land and natural resources and respect legitimate tenure rights related to the ownership and use of land and natural resources as set out in the relevant part(s) of the Voluntary Guidelines on the Responsible Governance of Tenure of Land, Fisheries and Forests in the Context of National Food Security (VGGT). Commitments are expected to be placed in formal policy documents. [Respect for Human Rights (web), N/A: suntory.com]</p> <ul style="list-style-type: none"> • Not Met: Respect land ownership and natural resources as set out in The IFC Performance Standards: The webpage section Respect for Human Rights indicates that: 'We also consider it crucial to protect land tenure, water access rights, and the rights of indigenous peoples. We will therefore promote human rights due diligence taking into account global frameworks such as [...] the IFC Format Standard'. However, 'consider it crucial to protect' is not considered a formal statement of commitment according to CHRB wording criteria. No policy statement found committing it to respect ownership/use of land and natural resources and respect legitimate tenure rights related to the ownership and use of land and natural resources as set out in the relevant part(s) of the IFC Performance Standards. Commitments are expected to be placed in formal policy documents. [Respect for Human Rights (web), N/A: suntory.com] • Not Met: Respecting indigenous peoples' rights or ILO Convention No.169 or UN Declaration: The webpage section Respect for Human Rights indicates that: 'We also consider it crucial to protect land tenure, water access rights, and the rights of indigenous peoples. We will therefore promote human rights due diligence taking into account global frameworks such [...] and ILO Indigenous and Tribal Peoples Convention (No. 169)'. However, 'consider it crucial to protect' is not considered a formal statement of commitment according to CHRB wording criteria. No policy statement found committing to respecting indigenous peoples' rights or references the relevant part(s) of the ILO Convention on Indigenous and Tribal Peoples No.169 or of the UN Declaration on the Rights of Indigenous Peoples. Commitments are expected to be placed in formal policy documents. [Respect for Human Rights (web), N/A: suntory.com] • Not Met: Expecting suppliers to make these commitments: The webpage section Respect for Human Rights indicates that: 'We also consider it crucial to protect land tenure, water access rights, and the rights of indigenous peoples. We will therefore promote human rights due diligence taking into account global frameworks such as the Voluntary Guidelines on the Responsible Governance of Tenure of Land, Fisheries and Forests in the Context of National Food Security (VGGT), the IFC Format Standard, and ILO Indigenous and Tribal Peoples Convention (No. 169). Furthermore, we expect the same respect from the Suntory Group's suppliers, including respect for ILO labor standards'. However, 'consider it crucial to protect' is not considered a formal statement of commitment according to CHRB wording criteria. No policy statement found expecting suppliers to commit to respect ownership/use of land and natural resources and respect legitimate tenure rights related to the ownership and use of land and natural resources as set out in the relevant part(s) of the Voluntary Guidelines on the Responsible Governance of Tenure of Land, Fisheries and Forests in the Context of National Food Security (VGGT) or the IFC Performance Standards. Suppliers are also expected to respecting indigenous peoples' rights or references the relevant part(s) of the ILO Convention on Indigenous and Tribal Peoples No.169 or of the UN Declaration on the Rights of Indigenous Peoples. Commitments are expected to be placed in formal policy documents. [Respect for Human Rights (web), N/A: suntory.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Respecting the right to water: The Company indicates on its website that: 'The Suntory Group endorsed The CEO Water Mandate global platform to address water resource issues'. [Endorsing The CEO Water Mandate on web, N/A: suntory.com] • Not Met: Company's policy commits to obtain FPIC • Not Met: Expecting suppliers to make these commitments <p>: The webpage section Respect for Human Rights indicates that: 'We also consider it crucial to protect land tenure, water access rights, and the rights of indigenous peoples. [...] Furthermore, we expect the same respect from the Suntory Group's suppliers, including respect for ILO labor standards'. However, 'consider it crucial to protect' is not considered a formal statement of commitment according to CHRB wording criteria. No policy statement found expecting suppliers to commit to respecting the right to water and ownership/use of land and natural resources also includes a commitment to obtain the free prior and informed consent (FPIC) from indigenous peoples and local communities for transaction(s) involving land and</p>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			natural resources or to a zero tolerance for land grabbing. Commitments are expected to be placed in formal policy documents. [Respect for Human Rights (web), N/A: suntory.com]
A.1.3.b.AG	Commitment to respect human rights particularly relevant to the industry – vulnerable groups (AG)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Women's rights: The webpage section Respect for Human Rights indicates: 'In conducting our business activities, we believe it is crucial to be aware particularly of the human rights of vulnerable groups of people (women, children, migrant workers, etc.) in our own operations and supply chain. As a corporate signatory to the UN Global Compact, we promote human rights due diligence with awareness of global frameworks such as the Women's Empowerment Principles'. However, although the Company indicates that it promotes the Women's Empowerment Principles, it is not clear it is a signatory of the Principles or formally committed to them. No publicly available policy statement found committing it to respect women's rights. Commitments are expected to be placed in formal policy documents. [Respect for Human Rights (web), N/A: suntory.com] • Not Met: Children's rights: The webpage section Respect for Human Rights indicates: 'In conducting our business activities, we believe it is crucial to be aware particularly of the human rights of vulnerable groups of people (women, children, migrant workers, etc.) in our own operations and supply chain. As a corporate signatory to the UN Global Compact, we promote human rights due diligence with awareness of global frameworks such as [...] the Children's Rights and Business Principles, [...]'. However, 'promote' is not considered a formal statement of commitment according to CHRB wording criteria. No evidence found that it commits to the Children's Rights and Business Principles. Commitments are expected to be placed in formal policy documents. [Respect for Human Rights (web), N/A: suntory.com] • Not Met: Migrant worker's rights: The webpage section Respect for Human Rights indicates: 'In conducting our business activities, we believe it is crucial to be aware particularly of the human rights of vulnerable groups of people (women, children, migrant workers, etc.) in our own operations and supply chain. As a corporate signatory to the UN Global Compact, we promote human rights due diligence with awareness of global frameworks such as [...] the International Convention on the Protection of the Rights of All Migrant Workers and Members of their Families'. However, 'promote' is not considered a formal statement of commitment according to CHRB wording criteria. No evidence found that it commits to the International Convention on the Protection of the Rights of All Migrant Workers and Members of their Families. Commitments are expected to be placed in formal policy documents. [Respect for Human Rights (web), N/A: suntory.com] • Not Met: Expects suppliers to respect at least one of these rights: The webpage section Respect for Human Rights indicates: 'In conducting our business activities, we believe it is crucial to be aware particularly of the human rights of vulnerable groups of people (women, children, migrant workers, etc.) in our own operations and supply chain. As a corporate signatory to the UN Global Compact, we promote human rights due diligence with awareness of global frameworks such as the Women's Empowerment Principles, the Children's Rights and Business Principles, and the International Convention on the Protection of the Rights of All Migrant Workers and Members of their Families. Furthermore, we also expect Suntory Group's suppliers to the same and respect the human rights of people in circumstances of vulnerability'. However, 'promote' is not considered a formal statement of commitment according to CHRB wording criteria. No evidence found that it expects suppliers to commit to respect the rights of women or the rights of children or the rights of migrant workers. Commitments are expected to be placed in formal policy documents. [Respect for Human Rights (web), N/A: suntory.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: CEDAW/Women's Empowerment Principles: The webpage section Respect for Human Rights indicates: 'In conducting our business activities, we believe it is crucial to be aware particularly of the human rights of vulnerable groups of people (women, children, migrant workers, etc.) in our own operations and supply chain. As a corporate signatory to the UN Global Compact, we promote human rights due diligence with awareness of global frameworks such as the Women's Empowerment Principles'. However, an awareness of the WEP is not enough to indicate a commitment to the rights enshrined in them. No publicly available policy statement found committing it to respect women's rights. Commitments are expected to be placed in formal policy documents. [Respect for Human Rights (web), N/A: suntory.com] • Not Met: Child Rights Convention/Business Principles: The webpage section Respect for Human Rights indicates: 'In conducting our business activities, we

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			<p>believe it is crucial to be aware particularly of the human rights of vulnerable groups of people (women, children, migrant workers, etc.) in our own operations and supply chain. As a corporate signatory to the UN Global Compact, we promote human rights due diligence with awareness of global frameworks such as [...] the Children's Rights and Business Principles, [...]. However, 'promote' is not considered a formal statement of commitment according to CHRB wording criteria. No evidence found that it commits to the Children's Rights and Business Principles. Commitments are expected to be placed in formal policy documents. [Respect for Human Rights (web), N/A: suntory.com]</p> <ul style="list-style-type: none"> • Not Met: Convention on migrant workers: The webpage section Respect for Human Rights indicates: 'In conducting our business activities, we believe it is crucial to be aware particularly of the human rights of vulnerable groups of people (women, children, migrant workers, etc.) in our own operations and supply chain. As a corporate signatory to the UN Global Compact, we promote human rights due diligence with awareness of global frameworks such as [...] the International Convention on the Protection of the Rights of All Migrant Workers and Members of their Families'. However, 'promote' is not considered a formal statement of commitment according to CHRB wording criteria. No evidence found that it commits to the International Convention on the Protection of the Rights of All Migrant Workers and Members of their Families. Commitments are expected to be placed in formal policy documents. [Respect for Human Rights (web), N/A: suntory.com] • Not Met: Expecting suppliers to respect these rights: The webpage section Respect for Human Rights indicates: 'In conducting our business activities, we believe it is crucial to be aware particularly of the human rights of vulnerable groups of people (women, children, migrant workers, etc.) in our own operations and supply chain. As a corporate signatory to the UN Global Compact, we promote human rights due diligence with awareness of global frameworks such as the Women's Empowerment Principles, the Children's Rights and Business Principles, and the International Convention on the Protection of the Rights of All Migrant Workers and Members of their Families. Furthermore, we also expect Suntory Group's suppliers to the same and respect the human rights of people in circumstances of vulnerability'. However, 'promote' is not considered a formal statement of commitment according to CHRB wording criteria. No evidence found that it expects suppliers to commit to the Women's Empowerment Principles, the Children's Rights and Business Principles, and the International Convention on the Protection of the Rights of All Migrant Workers and Members of their Families. Commitments are expected to be placed in formal policy documents. [Respect for Human Rights (web), N/A: suntory.com]
A.1.4	Commitment to remedy	0	<p>The individual elements of the assessment are met or not as follows: Score 1</p> <ul style="list-style-type: none"> • Not Met: The Company commits to remedy: The Human Rights Policy states that 'if it becomes clear that any of its business activities have directly caused negative impacts on human rights, or if indirect effects through business relations become clear, the Suntory Group will commence dialogue based on international standards through appropriate procedures.' However, it fails to state a clear commitment to remedy. The webpage section Respect for Human Rights indicates: 'As part of our efforts to promote corrective measures, if it becomes clear that Suntory Group business activities have directly caused negative impacts on human rights, or if indirect negative impact through business relations come to light or are suspected, the Suntory Group will take corrective measures (remedy) through dialogue with related parts, based on international standards and through appropriate procedures'. However, although the Company indicates, in its webpage that it will take corrective measures to correct wrongs, no formal policy statement found where the Company commits it to remedy the adverse impacts on individuals and workers and communities that it has caused or contributed to. Commitments are expected to be placed in Company policy documents. [Human Rights Policy, 10/07/2019: suntory.com] & [Respect for Human Rights (web), N/A: suntory.com] • Not Met: Company expect suppliers to make this commitment: The Supplier Guidelines specify the 'Business Conduct Principles'. It indicates: 'Suppliers must provide a right to remedy for their employees through an accessible and fair grievance process'. However, it is not clear it expects suppliers to commit to remedy the adverse impacts on individuals and communities as well as workers. The webpage section Respect for Human Rights indicates: 'As part of our efforts to promote corrective measures, if it becomes clear that Suntory Group business activities have directly caused negative impacts on human rights, or if indirect negative impact through business relations come to light or are suspected, the Suntory Group will take corrective measures (remedy) through dialogue with

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>related parts, based on international standards and through appropriate procedures. Furthermore, we expect Suntory Group's suppliers to undertake corrective measures (remedy) as well'. However, although the Company indicates, in its webpage that it expects suppliers to take corrective measures to correct wrongs, no evidence found of such expectation in a publicly available policy statement. Commitments are expected to be placed in Company policy documents. [Supplier Guidelines, 01/2022: suntory.com] & [Respect for Human Rights (web), N/A: suntory.com]</p> <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: The webpage section Respect for Human Rights indicates: 'In order to implement corrective measures, we will also work with external organizations such as human rights experts (NPOs) and Sedex to engage suppliers regarding any issues discovered, and to work together on corrective steps'. However, no formal policy statement found committing it to work with suppliers to remedy adverse impacts which are directly linked to the Company's operations, products or services. Commitments are expected to be placed in Company policy documents. [Respect for Human Rights (web), N/A: suntory.com]
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): The webpage section Respect for Human Rights indicates: 'we understand the important role played by human rights defenders, and regard them as stakeholders with whom we can collaborate in promoting human rights due diligence. We do not tolerate any discrimination or violence of any kind toward human rights defenders, and we require the same commitment from our suppliers'. However, according to CHRB standards the commitment has to be placed in formal policy documents. [Respect for Human Rights (web), N/A: suntory.com] • 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 webpage section Respect for Human Rights indicates: 'The Sustainability Officer is responsible for human rights, and her/his evaluation includes performance related to human rights due diligence, providing thus an additional incentive to further promote activities on this area (forced labor and child labor are particularly important issues). Similarly, within the Sustainability Management Division, the evaluation of senior managers in charge of human rights includes activities on human rights due diligence, providing thus an additional incentive to further promote activities on this area'. However, although the Company indicates who is in charge of human rights, it seems to refer to executive level. The indicator focuses on Supervisory Board level governance oversight of respect for human rights. [Respect for Human Rights (web), N/A: suntory.com] & [Leadership (web), N/A: suntory.com] • 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: In its feedback to CHRB, the Company indicates a letter by the Company's Representative Director, President & CEO Takeshi Niinami where it expresses some of the Company's approach to human rights: 'In 2019, the Suntory Group set forth a Sustainability Vision to further its goal of Growing for Good. Accordingly, the group is working as one to advance [...] respect human rights in the supply chain and to help people live spiritually rich and healthy lives. [...] "Good products" are not just about being safe, reliable and high-quality now. Increasingly, there is also the expectation of work to address environmental and social issues, such as [...] protection of human rights across the supply chain. We at the Suntory Group will listen to the voices of consumers and other stakeholders, with sustainability at the core of our management, and deliver good products that contribute to a sustainable society'. However, CHRB is looking for specific speeches or presentations where the board member discusses why human rights matter to the business or challenges that the Company has faced in respecting them. [Top Commitment (web), N/A: suntory.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
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: The webpage section Respect for Human Rights indicates: ‘The Human Rights Working Team, which is responsible for promoting human rights due diligence, formulates strategies and confirms the progress of ongoing activities through regular meetings, reporting to the Global Sustainability Committee. This Committee addressed internal and supply chain human rights issues twice in 2021, (June and August). [...] We assess human rights risks as a top-priority issue in our corporate management in cooperation with the Global Risk Management Committee, which is in charge of risk management for the entire Group, and regularly engage in information sharing and discussions about corporate risk management. [...] The discussions of the Global Sustainability Committee and Global Risk Management Committee are reported to the Board of Directors as appropriate. In addition, we respond to Japanese traditional human rights issues through our Human Rights Education Promotion Committee, which consists of a central committee and Human Rights Promotion Committee members from each business location’. However, although discussions on human rights are reported to the Board by the Global Sustainability Committee and Global Risk Management Committee, it is not clear the process the Company has in place to discuss and regularly review its human rights strategy or policy or management processes at board level or a board committee. The Committees previously mentioned seem to be executive level committees, so it is not clear how the Supervisory Board processes these briefings (i.e if there is a person or committee within the Supervisory Board acting on these Sustainability Committee and Risk Management Committee reports. [Respect for Human Rights (web), N/A: suntory.com] & [Leadership (web), N/A: suntory.com] • 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: The webpage section Respect for Human Rights indicates: ‘The Human Rights Working Team, which is responsible for promoting human rights due diligence, formulates strategies and confirms the progress of ongoing activities through regular meetings, reporting to the Global Sustainability Committee. This Committee addressed internal and supply chain human rights issues twice in 2021, (June and August). In this process, we consulted with external experts and human rights NPOs, and took their opinions into consideration in our internal discussions for both the Human Rights Working Team as well as the Global Sustainability Committee’. However, although the Company indicates it consults external experts and human rights NPOs, it is not clear how it informs human rights discussion at Board level, as discussions seem to take place at senior management level. [Respect for Human Rights (web), N/A: suntory.com] & [Leadership (web), N/A: suntory.com]
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: The webpage section Respect for Human Rights indicates: ‘The Sustainability Officer is responsible for human rights, and her/his evaluation includes performance related to human rights due diligence, providing thus an additional incentive to further promote activities on this area (forced labor and child labor are particularly important issues)’. However, it is not clear the Sustainability Office is a Board member. The indicator focuses on Supervisory Board member incentives linked to the company’s human rights policy commitment(s) or strategy. [Respect for Human Rights (web), N/A: suntory.com] • Not Met: At least one key HR risk, beyond employee H&S <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Performance criteria made public • Not Met: Review of other 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	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Score of 1 on A.1.2.a: See indicator A.1.2.a • Met: Senior responsibility for HR implementation and decision making: The webpage section Respect for Human Rights indicates: ‘The Human Rights Working Team, which is responsible for promoting human rights due diligence, formulates strategies and confirms the progress of ongoing activities through regular meetings, reporting to the Global Sustainability Committee. This Committee addressed internal and supply chain human rights issues twice in 2021, (June and August). [...] We assess human rights risks as a top-priority issue in our corporate management in cooperation with the Global Risk Management Committee, which is in charge of risk management for the entire Group, and regularly engage in information sharing and discussions about corporate risk management’. [Respect for Human Rights (web), N/A: suntory.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: How it assigns Day-to-day responsibility: The Company states that under the supervision of Global Sustainability Committee of the Suntory Group, each affiliate operates working teams in charge of human rights. The corporate management division and the business administration & HR division are in charge of human rights issues of Suntory Beverage & Food. [Suntory CSR Group Site, 2019: suntory.com] • Met: Day-to-day resources and expertise allocation in own ops: The webpage section Respect for Human Rights indicates: ‘Regarding the day-to-day resources allocated, the Human Rights Team (section manager + staff) within the Sustainability Management Division, as well as the Sustainability Promotion Group (full time department manager + section manager + staff) within the Supply Chain Division are in charge of day-to-day activities’. Also, ‘we respond to Japanese traditional human rights issues through our Human Rights Education Promotion Committee, which consists of a central committee and Human Rights Promotion Committee members from each business location’. [Respect for Human Rights (web), N/A: suntory.com] • Met: Resources and expertise allocation in the supply chain: The webpage section Respect for Human Rights indicates: ‘Regarding the day-to-day resources allocated, the Human Rights Team (section manager + staff) within the Sustainability Management Division, as well as the Sustainability Promotion Group (full time department manager + section manager + staff) within the Supply Chain Division are in charge of day-to-day activities’. [Respect for Human Rights (web), N/A: suntory.com]
B.1.2	Incentives and performance management	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Senior manager incentives for human rights: The webpage section Respect for Human Rights indicates: ‘The Sustainability Officer is responsible for human rights, and her/his evaluation includes performance related to human rights due diligence, providing thus an additional incentive to further promote activities on this area (forced labor and child labor are particularly important issues). Similarly, within the Sustainability Management Division, the evaluation of senior managers in charge of human rights includes activities on human rights due diligence, providing thus an additional incentive to further promote activities on this area’. [Respect for Human Rights (web), N/A: suntory.com] • Not Met: At least one key HR risk, beyond employee H&S <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Performance criteria made public • Not Met: Review of other senior management performance
B.1.3	Integration with enterprise risk management	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: HR risks is integrated as part of enterprise risk system: The Company states, in its 2021 CSR Group Site, that it has conducted a potential risk assessment for the countries in which its 90 factories globally are located, using general country and industry data. Of these, India, Vietnam, Mexico, Thailand, and Malaysia were countries with high risk of child and forced labour where it has plants. And it will carry out individual evaluations on the factories located in high-risk areas. However, it is not clear whether the company includes human rights risks in its enterprise risk management system or this is part of a due diligence process that is

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>not integrated in Corporate risk management system. Previous evidence was based on sources that are now out of the three-year timeframe that the methodology requires. Also, the webpage section Respect for Human Rights indicates: 'We assess human rights risks as a top-priority issue in our corporate management in cooperation with the Global Risk Management Committee, which is in charge of risk management for the entire Group, and regularly engage in information sharing and discussions about corporate risk management'. [2021 CSR Group Site, 31/12/2020: suntory.com] & [Respect for Human Rights (web), N/A: suntory.com]</p> <ul style="list-style-type: none"> • Not Met: Provides an example: See above. <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Audit Ctte or independent risk assessment
B.1.4.a	Communication /dissemination of policy commitment(s) to workers and external stakeholders	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Score of 1 on A.1.2.a: See indicator A.1.2.a [Human Rights Policy, 10/07/2019: suntory.com] • Met: Communicates its policy to all workers in own operations: The webpage section Respect for Human Rights indicates: 'Every year, the Suntory Group conducts a sustainability e-learning program for approximately 20,000 employees to learn about global ESG trends, including human rights, and the company's initiatives. In addition, to facilitate understanding of the Suntory Group's Code of Business Ethics (including human rights) among all officers and employees of the Suntory Group, and to encourage them to practice these ethics in their daily activities, we have included the Code in a booklet that summarizes the Suntory Group's system of philosophy, which is distributed to all employees. To promote global understanding, we have translated the booklet into 11 languages, and its contents are read and signed once each year. Group companies outside Japan also carry out similar efforts to promote compliance and human rights understanding in various regions'. [Respect for Human Rights (web), N/A: suntory.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Communication of policy commitments to stakeholder: The webpage section Respect for Human Rights indicates: 'As for sharing with external stakeholders, we disclose our Human Rights Policy on our official website and share it with our raw material, packaging, and logistics suppliers at annual supplier briefings through our supplier guidelines, which include our human rights commitment, covering more than 98% of the Suntory Group's purchasing volume'. However, although the Company indicates how it communicates its Human Rights Policy to most of its suppliers and that it is available online, it is not clear how it actively communicates its policy commitments to affected stakeholders, including local communities (communication to suppliers is assessed in indicator B.1.4.b). [Respect for Human Rights (web), N/A: suntory.com] • Not Met: How policy commitments are made accessible to audience: The Company indicates that when communicating its commitments to its workers 'contents are read and signed once each year'. However, no further information found, including how ensures commitments are made accessible to other stakeholders such as local communities in the locations where it has operations. [Respect for Human Rights (web), N/A: suntory.com]
B.1.4.b	Communication /dissemination of policy commitment(s) to business relationships	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Meets ILO requirement for suppliers on A.1.2.a: See A.1.2.a • Met: Requires suppliers to communicate policy requirements: The Company states that it is working to promote activities for respecting human rights throughout the entire supply chain while linking to business partners by establishing the Basic Policy on Supply Chain Sustainability. 'The Company has a Supplier Guidelines, which states that 'we will promote supply chain CSR initiatives that respect basic human rights and are mindful of labour conditions and safety and health'. It also states that 'To comply with all our requirements, Suppliers are expected to engage their own partners, supply chain and subsidiaries to respect the Suntory Group Supplier Guidelines.' [Supplier Guidelines, 01/2022: suntory.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: How HR commitments made binding/contractual: The webpage section Basic Policy on Supply Chain Sustainability notes: 'We established the Suntory Group Supplier Guidelines based on the Basic Policy on the Sustainable Supply Chain in June 2017 to contribute to the realization of a sustainable society while also accelerating sustainable procurement within the Suntory Group. These guidelines put in place specific compliance items required in each field from human rights and legal compliance to the environment for suppliers of Suntory in Japan and overseas to confirm the same ethical values are shared between the Suntory Group and its suppliers. Compliance with our human rights commitments is a

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>prerequisite for engaging in a business relationship with suppliers, and we require signing our Code of Conduct/Supplier Guidelines to both new and current suppliers'. Both the Code of Conduct and the Supplier Guidelines contain the Company's provisions on human rights. [Basic Policy on Supply Chain Sustainability (web), N/A: suntory.com]</p> <ul style="list-style-type: none"> • Not Met: Company requires suppliers to cascade down to their suppliers: The webpage section Basic Policy on Supply Chain Sustainability notes: 'These guidelines [supplier guidelines] put in place specific compliance items required in each field from human rights and legal compliance to the environment for suppliers of Suntory in Japan and overseas [...]. Compliance with our human rights commitments is a prerequisite for engaging in a business relationship with suppliers, and we require signing our Code of Conduct/Supplier Guidelines to both new and current suppliers [...] In addition, in terms of human rights commitments, we request suppliers to cascade down those commitments to their own suppliers'. Both the Code of Conduct and the Supplier Guidelines contain the Company's provisions on human rights. However, although the Company indicates it requests suppliers to cascade down the commitments, it is not clear that suppliers are required to cascade the commitments as part of a contractual agreement. The Company has provided an additional source to this indicator, however, no material evidence was found, as it indicates it expected 'the same respect from the Suntory Group's suppliers, including respect for ILO labor standards' after citing different considerations on land tenure, water access rights, and the rights of indigenous peoples. [Basic Policy on Supply Chain Sustainability (web), N/A: suntory.com]
B.1.5	Training on Human Rights	1	<p>The individual elements of the assessment are met or not as follows: Score 1</p> <ul style="list-style-type: none"> • Met: Scores at least 1 on A.1.2.a: See indicator A.1.2 • Not Met: How workers are trained on HR policy commitments: The Company states, in its 2021 CSR Group Site, that it is holding human rights lectures and seminars at a departmental level in addition to conducting human rights training for new managers, new employees, and other staff in Japan. It is also holding seminars to raise awareness related to human rights that are more closely related to human rights issues in the workplace through in-person and online from 2020. However, it is not clear whether the Company provides human rights training to not only employees in Japan but also globally. The webpage section Respect for Human Rights indicates: 'Every year, the Suntory Group conducts a sustainability e-learning program for approximately 20,000 employees to learn about global ESG trends, including human rights, and the company's initiatives'. However, although it indicates that it trains a number of workers, it is not clear whether it includes human rights commitments (as it refers to ESG trends). It continuous: 'In addition, to facilitate understanding of the Suntory Group's Code of Business Ethics (including human rights) among all officers and employees of the Suntory Group, and to encourage them to practice these ethics in their daily activities, we have included the Code in a booklet that summarizes the Suntory Group's system of philosophy, which is distributed to all employees. To promote global understanding, we have translated the booklet into 11 languages, and its contents are read and signed once each year. Group companies outside Japan also carry out similar efforts to promote compliance and human rights understanding in various regions'. However, although it indicates is communicates is Code of Business Ethics, the indicator focuses in human rights training specifically. The Company is expected to describe how its workers are trained on its human rights policy commitment. Current evidence found shows training in Japan. Although it is not a formal requirement that all Company workers are trained, workers generally need to receive training in human rights policy commitments (including overseas) [2021 CSR Group Site, 31/12/2020: suntory.com] & [Respect for Human Rights (web), N/A: suntory.com] • Met: Trains relevant managers including procurement: The webpage section Respect for Human Rights also indicates: 'Regarding our corporate management, every year we provide briefings on sustainability encompassing human rights as part of our annual training for newly appointed managers. In addition, members and management of the procurement department, which is closely involved with human rights initiatives, are all provided with briefings on sustainability encompassing human rights'. [Respect for Human Rights (web), N/A: suntory.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Score of 2 on A.1.2.a: See indicator A.1.2 • Not Met: Meets both requirements under score 1 • Not Met: Trains suppliers to meet company's HR commitment: The webpage section Respect for Human Rights also notes: 'we disclose our Human Rights Policy on our official website and share it with our raw material, packaging, and logistics

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>suppliers at annual supplier briefings through our supplier guidelines, which include our human rights commitment, covering more than 98% of the Suntory Group's purchasing volume'. However, no description found on how it trains suppliers to help them meet its human rights policies. Current evidence refers to policy sharing at annual briefings. It is not clear if actual training sessions take place in this (or other) context. [Respect for Human Rights (web), N/A: suntory.com]</p> <ul style="list-style-type: none"> • Not Met: Disclose % trained: The webpage section Respect for Human Rights also notes: 'we disclose our Human Rights Policy on our official website and share it with our raw material, packaging, and logistics suppliers at annual supplier briefings through our supplier guidelines, which include our human rights commitment, covering more than 98% of the Suntory Group's purchasing volume'. However, it is not clear if this entails training sessions or are just policy communication in the context of a broader annual briefing. [Respect for Human Rights (web), N/A: suntory.com]
B.1.6	Monitoring and corrective actions	0.5	<p>The individual elements of the assessment are met or not as follows: Score 1</p> <ul style="list-style-type: none"> • Met: Scores at least 1 on A.1.2.a: See indicator A.1.2.a • Met: Monitoring implementation of HR policy commitments across global ops and supply chain: The webpage Respect for Human Rights indicates: 'In the first half of 2022, we implemented Sedex in all of our 20 factories in Japan (beer business, spirits business, beverage business) and 6 spirits and beverage factories in India, Mexico, Vietnam, Thailand and Malaysia in order to visualize human rights risks and strengthen management at our own plants. We assessed the management capability toward potential risks in 4 categories: (1) labor practices, (2) health and safety, (3) business ethics, and (4) environment. [...] In the second half of 2022, we plan to expand Sedex to all remaining plants (spirits and beverages), aiming to cover all major global business plants, and continue human rights management from 2023 onwards'. As for its supply chain, it explains its impact assessment by Sedex: 'We joined Sedex in June 2019, and since then we are engaging our suppliers to share information through Sedex by answering to the SAQ. These SAQs evaluate the potential social risks in the supply chain by focusing on child labor, forced labor and other human rights issues as well as considerations toward the work environment and occupational safety'. [Respect for Human Rights (web), N/A: suntory.com] • Met: Proportion of supply chain monitored: The webpage section Respect for Human Rights indicates: 'We currently conduct continuous monitoring of our suppliers through Sedex, representing over 70% of our purchasing volume globally'. [Respect for Human Rights (web), N/A: suntory.com] • Not Met: Describe how workers are involved in monitoring: It also states that 'The monitoring process leverages also SMETA audit information on the supply chain, including interviews with local workers. In this way, we try to leverage the voices of rightholders'. However, this subindicator looks for evidence of how the Company's own workers are involved as part of the monitoring process. [Respect for Human Rights (web), N/A: suntory.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Score of 2 on A.1.2.a: See indicator A.1.2.a • Met: Describes corrective action process: Regarding potential risks the webpage section Respect for Human Rights indicates: 'we also assess the management capability of our supplier's manufacturing sites in respect to the potential risks. Based on that, we engage manufacturing sites, in particular sites with "high risk + low management capability" and work together to improve their management capability. [...] Going forward, we will continue to engage our suppliers and promote improvement activities. [...] We communicate directly with suppliers regarding issues identified in Sedex by third-party audits, and we check that these issues are corrected within six months of having been pointed out'. Also: 'Our remedy process using Sedex and SMETA information is as follows: Cases of Potential Risk: 1. Goal: to confirm that sufficient measures are taken toward avoiding potential risks. 2. Index: Sedex risk and management scores. 3. Timeframe: check the risk score and management capability score periodically (about once every six months), and confirm the status of the improvement activities of business partners'. [Respect for Human Rights (web), N/A: suntory.com] • Met: Disclose findings and number of corrective action: The Company reports that at the second half of 2021, it continued checking the non-compliances of supplier's manufacturing sites obtained through Sedex third party audit data, with a total of 180 important non-compliances visualized. Among them, there were 3 cases for collective bargaining, 48 cases for labour management, 21 cases for working hours, and 26 cases for salary and welfare. Regarding the above-mentioned important non-compliances found through third-party audit data in

Indicator Code	Indicator name	Score (out of 2)	Explanation
			Sedex, it communicates directly with its suppliers and confirm that the non-compliances found are corrected within 6 months. As of the end of November 2021, it has confirmed that 140 of the 180 important non-compliances have already been corrected. For the remaining 40 cases, it will continue to engage with suppliers and promote improvement activities. [Sustainable Procurement, N/A: suntory.com]
B.1.7	Engaging and terminating business relationships	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: HR affects selection of suppliers: The Company indicates that 'we examine not only our existing suppliers to identify those that are at high social risk including human rights, but assess potential new suppliers before we start business relationships'. The supplier guidelines indicate that the document 'is the first step of the approval process before any commitment with the Suntory Group'. [2021 CSR Group Site, 31/12/2020: suntory.com] & [Supplier Guidelines, 01/2022: suntory.com] • Met: HR affects on-going supplier relationships: The webpage section Basic Policy on Supply Chain Sustainability indicates: 'If a serious law-breaking human rights violation is discovered and it is recognized that the supplier has no intention of improving even after communication, it may lead to the termination of the contract'. [Basic Policy on Supply Chain Sustainability (web), N/A: suntory.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describe positive incentives offered to respect human rights • Met: Working with suppliers to meet HR requirements: The webpage section Basic Policy on Supply Chain Sustainability also indicates: 'In order to comply with our Supplier Guidelines, we are promoting joint efforts with suppliers, such as sharing those guidelines at supplier meetings or sharing related information through Sedex'. In addition, the human rights website of the Company indicates that : 'we also assess the management capability of our supplier's manufacturing sites in respect to the potential risks. Based on that, we engage manufacturing sites, in particular sites with "high risk + low management capability" and work together to improve their management capability. [...] Going forward, we will continue to engage our suppliers and promote improvement activities. [Basic Policy on Supply Chain Sustainability (web), N/A: suntory.com] & [Respect for Human Rights (web), N/A: suntory.com]
B.1.8	Approach to engagement with affected stakeholders	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Stakeholder process or systems to identify and engage with workers/communities in the last two years: The webpage section Respect for Human Rights indicates: 'We believe that identifying and engaging stakeholders is important when promoting human rights due diligence. Stakeholders mentioned here include rightholders, as well as other related stakeholders (NGOs / NPOs, experts, etc.). We have discussed with external human rights experts to identify our key stakeholders in consideration of our business structure. These key stakeholders are: (1) Our employees, outsourced manufacturing employees, and the local community around the plants. (2) Our business partners' employees (suppliers, farms), the local community around our business partners' plants and agricultural fields. (3) Investors, benchmarking organizations (4) NGOs, experts (5) Customers'. The Company also indicates it has engaged different external experts such as the 'Human Rights NPOs (CRT), the IHRB, the Danish Institute for Human Rights and the UNDP'. They also 'conduct[ed] third-party interviews of migrant workers (foreign technical intern trainees) in our Japan group company Izutsu Maisen at the end of 2021'. It also notes: 'In the first half of 2022, we continued our risk assessments through Sedex, during which we obtained data for 1,094 manufacturing plants from suppliers worldwide. [...] The monitoring process leverages also SMETA audit information on the supply chain, including interviews with local workers. In this way, we try to leverage the voices of rightholders'. [Respect for Human Rights (web), N/A: suntory.com] • Met: Provides two examples of engagement with stakeholders: The Company indicates: 'An example of our third-party interviews can be seen in the third-party interviews conducted by CRT with migrant workers (foreign technical intern trainees) at our group company Izutsu Maisen in 2021. In doing so, we listened to their perspectives on human rights and related issues of migrant workers (communication, cross-cultural understanding, and creating a more comfortable workplace). We regard this as important information to be used in our future human rights due diligence efforts'. Also, as indicated above, In the first half of 2022, we continued our risk assessments through Sedex, during which we obtained data for 1,094 manufacturing plants from suppliers worldwide. [...] The monitoring process leverages also SMETA audit information on the supply chain, including

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>interviews with local workers. In this way, we try to leverage the voices of rightholders'. [Respect for Human Rights (web), N/A: suntory.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Met: Analysis of stakeholder views on company's HR issues: The webpage section Respect for Human Rights indicates: 'With the establishment of the Suntory Group Human Rights Policy, we identified six important themes regarding human rights in our global business activities listed in the above policy, in cooperation with external experts. The process involved understanding the characteristics of our own plants and our supply chain, particularly the agricultural products from which our products are made, while also leveraging information from a variety of external human rights-related reports. As we move forward, in formulating an action plan we will continue to assess the risks in the own operations and supply chain focusing on these six themes. We held expert dialogues in 2019 and 2020 with representatives from global organizations such as Human Rights NPOs (CRT), the IHRB, the Danish Institute for Human Rights and the UNDP to discuss about our human rights risks, and use this information on our human rights due diligence strategy. For example, in response to the growing risk in the global labor market of migrant workers being subject to forced labor, we were advised to identify this risk in Japan as well. This led us to conduct third-party interviews of migrant workers (foreign technical intern trainees) in our Japan group company Izutsu Maisen at the end of 2021'. The Company also discloses the 'Findings from Interviews with Foreign Workers', which includes human rights aspects. [Respect for Human Rights (web), N/A: suntory.com] & [Findings from Interviews with Foreign Workers, 30/11/2021: suntory.com] • Met: Describe how views influenced company's HR approach: As indicated above, the Company claims that it identified human rights themes in cooperation with external experts and foreign workers, in order to formulate plans for specific issues considered relevant, such as forced labour, affecting particularly to migrant workers. [Respect for Human Rights (web), N/A: suntory.com]

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	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Identifying risks in own operations: The webpage section Respect for Human Rights indicates: 'With the establishment of the Suntory Group Human Rights Policy, we identified six important themes regarding human rights in our global business activities [...], in cooperation with external experts. The process involved understanding the characteristics of our own plants and our supply chain, particularly the agricultural products from which our products are made, while also leveraging information from a variety of external human rights-related reports'. See below further description of consultation as part of the due diligence process. [Respect for Human Rights (web), N/A: suntory.com] • Met: Identifying risks through relevant business relationships: See above. The Company indicates that worked with experts and assessed characteristics of plans and supply chain including agricultural products. In addition it is engaging its suppliers to share information through Sedex by answering to the SAQ, which evaluates the potential social risks in the supply chain by focusing on child labour, forced labour and other human rights issues as well as considerations toward the work environment and occupational safety. As of May 2021, it has confirmed that over 1,000 manufacturing sites of approximately 650 major suppliers have joined the Sedex. [2021 CSR Group Site, 31/12/2020: suntory.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Describe ongoing global risk identification in consultation with stakeholder/HR experts: The webpage section Respect for Human Rights indicates: 'We believe that identifying and engaging stakeholders is important when promoting human rights due diligence. Stakeholders mentioned here include rightholders, as well as other related stakeholders (NGOs / NPOs, experts, etc.). [...] We held expert dialogues in 2019 and 2020 with representatives from global organizations such as Human Rights NPOs (CRT), the IHRB, the Danish Institute for Human Rights and the UNDP to discuss about our human rights risks, and use this information on our human rights due diligence strategy. [Respect for Human Rights (web), N/A: suntory.com] • Not Met: Triggered by new circumstances

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Met: Describes risks identified: The Company reports an example: 'in response to the growing risk in the global labor market of migrant workers being subject to forced labor, we were advised to identify this risk in Japan as well. This led us to conduct third-party interviews of migrant workers (foreign technical intern trainees) in our Japan group company Izutsu Maisen at the end of 2021'. [Respect for Human Rights (web), N/A: suntory.com]
B.2.2	Assessing human rights risks and impacts	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Describe process for assessment of HR risks and discloses salient HR issues: The webpage section Respect for Human Rights indicates: 'For the human rights risks identified by the human rights NPOs, experts, and global data sources mentioned above, a specific risk assessment is made through Sedex's SAQ and risk assessment tools, SMETA information, and third-party interviews. These assessments include consideration of the geographic, economic, and social perspectives of the different regions and rightholders that are prone to specific human rights risks. [...] As for its internal operation: 'In order to promote risk assessment as a part of our human rights due diligence process, we have conducted a potential risk assessment in collaboration with Verisk Maplecroft, a global risk consulting company, for the countries in which our 90 factories globally are located, using general country and industry data'. [Respect for Human Rights (web), N/A: suntory.com] • Met: How process applies to supply chain: The webpage section Respect for Human Rights indicates: 'For the human rights risks identified by the human rights NPOs, experts, and global data sources mentioned above, a specific risk assessment is made through Sedex's SAQ and risk assessment tools, SMETA information, and third-party interviews. These assessments include consideration of the geographic, economic, and social perspectives of the different regions and rightholders that are prone to specific human rights risks. Based on this information, we promote evaluation and corrective actions starting from high risk areas/issues'. Regarding its supply chain, it explains: 'In order to promote risk assessment as a part of our human rights due diligence process, we have conducted a potential risk assessment in collaboration with Verisk Maplecroft, a global risk consulting company, for our major ingredients using general country and industry data. (major ingredients x country combinations for a total of 124 patterns)'. [Respect for Human Rights (web), N/A: suntory.com] • Met: Public disclosure of the results of HR assessment: The Company indicates: 'With the establishment of the Suntory Group Human Rights Policy, we identified six important themes regarding human rights in our global business activities listed in the above policy, in cooperation with external experts. [...] As stated in our Human Rights Policy, our key themes in human rights include child labor, forced labor, discrimination and harassment, freedom of association, and a good working environment (health and safety)'. [Respect for Human Rights (web), N/A: suntory.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Meets all requirements under score 1: See above. [2021 CSR Group Site, 31/12/2020: suntory.com] • Met: How it involved affected stakeholders in the assessment: It indicates: 'We utilize information on Sedex and third-party interviews as key processes to engage with stakeholders (rightholders)'. The Company provides an example of interviews with migrant workers_ As advised in the dialogue with overseas experts and Caux Round Table Japan (CRT) in 2019, we are assessing the labor conditions of migrant workers including foreign technical intern trainees, which are a particularly vulnerable type of rightholders in Japan. We engaged CRT and conducted third-party interviews (impact assessment) for human rights at the Tsukuba and Takatsu plants of Izutsu Maisen, a group company that hires foreign technical intern trainees, and interviewed them in 2021. Taking into consideration that all interviewees were foreigners and women, we identified particularly important human rights risks that could arise in their context, and conducted direct interviews based on these risks, in a way that allowed rightholders to freely express their opinions with total anonymity'. [Respect for Human Rights (web), N/A: suntory.com]
B.2.3	Integrating and acting on human rights risks and impact assessments	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Action Plans to mitigate risks: The webpage section Respect for Human Rights indicates: 'While taking into consideration the risks and other factors identified through the above process, we will implement the following priority initiatives as our action plan'. In relation to its own plants: 'We will proceed with the Sedex rollout at the remaining Suntory-owned plants worldwide during the

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>second half of 2022, and determine whether there are any human rights risks'. However, although the Company indicates its future plans, no further description found of its global system to prevent, mitigate or remediate its salient human rights issues. Current evidence seems to refer to a monitoring process (which is assessed in indicator B.1.6) [Respect for Human Rights (web), N/A: suntory.com]</p> <ul style="list-style-type: none"> • Not Met: Description of how global system applies to supply chain: The webpage section Respect for Human Rights indicates: 'While taking into consideration the risks and other factors identified through the above process, we will implement the following priority initiatives as our action plan'. In relation to its Supply Chain 'With regard to 1st tier suppliers, we will continue to promote the remedy of important non-compliances that have become apparent through Sedex, and will continue to encourage suppliers to improve their management capabilities with regard to potential risks. In addition, we will move forward with impact assessments for upstream suppliers in our main raw materials supply chain'. However, no description found of how to prevent, mitigate or remediate its salient human rights issues its global system applies to its supply chain. Current evidence seems to refer to a monitoring process (which is assessed in indicator B.1.6) [Respect for Human Rights (web), N/A: suntory.com] • Not Met: Example of actions decided on at least 1 salient HR issues: Regarding Migrant Workers, the webpage section Respect for Human Rights indicates: 'We will identify sites other than our own plants where migrant workers (especially technical intern trainees) are present, and consider necessary steps depending on the degree to which the significant risk of forced labor is present'. However, it is not clear the specific actions taken or to be taken on at least one of its salient human rights issues, in this case forced labor. Evidence found seems to refer to a monitoring and corrective action process, rather than broad actions taken in a proactive way to mitigate a particular risk or impact. [Respect for Human Rights (web), N/A: suntory.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets all requirements under score 1 • Not Met: Involve stakeholders in decisions about actions: Although the Company reports in relation to risk in the labor market for migrant workers being subject to forced labour and how it engaged with rights holders including in Japan to assess potential risks, no details found on whether it consult with them or other stakeholders in relation to decisions taken to mitigate risks. Consultation seems to take place in the identification and assessment of saliency of potential risks, rather than agree in actions to be taken to prevent or mitigate the risk.
B.2.4	Tracking the effectiveness of actions to respond to human rights risks and impacts	0	<p>The individual elements of the assessment are met or not as follows: Score 1</p> <ul style="list-style-type: none"> • Not Met: System for tracking or monitor if actions taken are effective: The Company indicates that: 'We measure the effectiveness of our assessment and remediation efforts through Sedex at our plants and in our supply chain by measuring the degree of improvement across multiple risks (health and safety, worker age, discrimination, work based on free choice, etc.) before and after the execution of remediation efforts addressing the risks we have identified through the Sedex'. However, although the Company indicates its system to assess the degree of improvement of its risks, it is not clear how it track or monitors the actions taken. The Company has provided an additional source to this indicator, however, no material evidence was found. Current evidence seems to refer to corrective action processes (assessed under B.1.6) rather than whether risks and impacts as a whole are being prevented or mitigated. [Respect for Human Rights (web), N/A: suntory.com] • Not Met: Lessons learnt from checking system effectiveness: The Company indicates: 'We measure the effectiveness of our assessment and remediation efforts through Sedex at our plants and in our supply chain by measuring the degree of improvement across multiple risks (health and safety, worker age, discrimination, work based on free choice, etc.) before and after the execution of remediation efforts addressing the risks we have identified through the Sedex. In the case of Sedex assessment, there are items for which it is challenging to reduce the potential risk, but even if the potential risk is high, the risk can be controlled if the management capability is high. Based on this premise, we focus on improving management capability as we undertake corrective actions at our own plants and with our suppliers'. However, although the Company points out a lesson learned, no reference to any specific salient human rights issues in relation to this particular lesson found. The Company is expected to provide an example of the lessons learned while tracking the effectiveness of its actions on at least one of its salient human rights issues as a result of its due diligence process. [Respect for Human Rights (web), N/A: suntory.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets both requirements under score 1: See above. • Not Met: Involve stakeholders in evaluation of actions taken: The Company indicates: 'As an example of information gathering through Sedex, when we implement Sedex at our own plants, we communicate directly with the office management of each plant to exchange opinions from the perspective of human rights risks. An example of our third-party interviews can be seen in the third-party interviews conducted by CRT with migrant workers (foreign technical intern trainees) at our group company Izutsu Maisen in 2021. In doing so, we listened to their perspectives on human rights and related issues of migrant workers (communication, cross-cultural understanding, and creating a more comfortable workplace). We regard this as important information to be used in our future human rights due diligence efforts'. However, although the Company indicates has engaged with migrant workers, it is not clear how it involves affected stakeholders in evaluation of whether the actions taken [as a result of its human rights risk assessment] have been effective. This indicator looks for evaluation of broad measures taken to face risks and impacts generally, rather than tracking effectiveness of corrective action processes at a specific plant. [Respect for Human Rights (web), N/A: suntory.com]
B.2.5	Communicating on human rights impacts	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Provides two examples of comms with stakeholders: The Company indicates: 'We believe that communicating with stakeholders on human rights risks and impact is critical to our stakeholder engagement. For example, we carry out direct communication that is attentive to rightholders (as in the interviews with migrant workers at Izutsu Maisen described above), and we communicate through briefings for suppliers (on supplier guideline compliance)'. However, while the Company indicates it has engaged with migrant workers, the Company is expected to provide at least two examples demonstrating how it communicates with affected stakeholders regarding specific human rights impacts raised by them or on their behalf. No further evidence found. [Promoting Work-Life Balance (web), N/A: suntory.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describe challenges to effective comms and how it is working to address them: The Company indicates: 'On the other hand, while identifying and approaching rightholders upstream in the supply chain is a very important component of stakeholder communication, it is also a challenging area of activity that must be addressed step by step and after proper prioritization. We plan to engage and communicate with the main stakeholders of the high-potential-risk and high-impact raw materials that we identified in 2021'. However, it not clear if the Company has had any challenges to effective communication it has identified in its due diligence process to identify human rights risks and how it is working to address them. The example given seems to focus on rightholders identification. [Promoting Work-Life Balance (web), N/A: suntory.com]

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	<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: Channel accessible to all workers: The Company states that 'the basic rule in Suntory is that when an employee discovers actions that breach the Suntory Group's Code of Business Ethics, he or she must first report it to the supervisors and seek their advice. However, we have installed a Compliance Hotline both at our Compliance Office and at an external law firm as a common contact point for all of the Group companies in Japan in order to quickly discover and resolve problems when reporting or consulting with a supervisor is not appropriate.' In addition, the Company also provides an independent internal contact point at 11 Group companies and conducts annual training to improve the response of those in charge of this independent contact point in the Compliance Department. The Company's Code of Business Ethics includes Human Right Requirements. [2021 CSR Group Site, 31/12/2020: suntory.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Channel is available in all appropriate languages and workers aware: Regarding its hotline, it indicates that the 'contact point supports multiple languages such as English, Chinese, and Spanish, and accepts reports and consultations from multiple countries'. It also notes 'to facilitate understanding of the Suntory Group's Code of Business Ethics (including human rights) among all officers and employees of the Suntory Group, and to encourage them to practice these ethics in their daily activities, we have included the Code in a booklet that summarizes the Suntory Group's system of philosophy, which is distributed to all employees'. The Code contains information on the hotline. However, although the Company indicates that the line is available in at least four languages (Japanese, Chinese, English and Spanish), it is not clear it is available in all appropriate languages. [Respect for Human Rights (web), N/A: suntory.com] • Met: Describe how workers in the supply chain have access to grievance mechanism: The supplier guidelines document requires the following: 'suppliers are expected to have appropriate mechanisms by which employees can raise concerns protected from retaliation'. [Supplier Guidelines, 01/2022: suntory.com] • Met: Expect Suppliers to convey expectation to their own suppliers: The Supplier Guidelines indicates: 'suppliers are expected to have appropriate mechanisms by which employees can raise concerns protected from retaliation'. Regarding the Supplier Guidelines, the webpage section Basic Policy on Supply Chain Sustainability notes: 'Compliance with our human rights commitments is a prerequisite for engaging in a business relationship with suppliers, and we require signing our Code of Conduct/Supplier Guidelines to both new and current suppliers [...] In addition, in terms of human rights commitments, we request suppliers to cascade down those commitments to their own suppliers'. [Supplier Guidelines, 01/2022: suntory.com] & [Basic Policy on Supply Chain Sustainability (web), N/A: suntory.com]
C.2	Grievance channel(s)/mechanism(s) to receive complaints or concerns from external individuals and communities	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Grievance mechanism for community: The webpage section Respect for Human Rights indicates: 'based on our belief that all our stakeholders are customers, suppliers are also regarded as important customers. Therefore, when promoting human rights due diligence, we think it is important that not only our employees, but also our direct suppliers, their own suppliers, as well as other related parties (their local community, etc.) have access to a grievance mechanism, including human rights issues'. Below this piece of information, the Company provides a link to the webpage section Contact Us, which is openly available to anyone to use. [Respect for Human Rights (web), N/A: suntory.com] & [Contact Us (web), N/A: ssl1.suntory.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describes accessibility and local languages and stakeholder awareness: See above. The webpage section Contact Us is only available in English. It is not clear how it ensures the mechanism is available in local languages and that all affected external stakeholders at its own operations are aware of it. [Respect for Human Rights (web), N/A: suntory.com] • Met: Communities access mechanism direct or through suppliers: The webpage section Respect for Human Rights indicates: 'Since its founding, the Suntory Group has placed customer satisfaction first and valued proactive communication with customers. In addition, based on our belief that all our stakeholders are customers, suppliers are also regarded as important customers. Therefore, when promoting human rights due diligence, we think it is important that not only our employees, but also our direct suppliers, their own suppliers, as well as other related parties (their local community, etc.) have access to a grievance mechanism, including human rights issues. Furthermore, as stated in our supplier guidelines, we expect suppliers to establish similar grievance mechanisms (with no retaliation) within their own supply chain, thereby striving to promote access to remedy upstream in our supply chain. Currently, we have established a Customer Center as a contact point for suppliers and their related parties (communities) to use. The Customer Center accepts inquiries from all customers'. [Respect for Human Rights (web), N/A: suntory.com] • Met: Expect supplier to convey expectation to their own suppliers: As indicated above 'direct suppliers, their own suppliers, as well as other related parties (their local community, etc.) have access to a grievance mechanism'. [Respect for Human Rights (web), N/A: suntory.com] & [Basic Policy on Supply Chain Sustainability (web), N/A: suntory.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.3	Users are involved in the design and performance of the channel(s)/mechanism(s)	0	<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: Engages users to create or assess system: The webpage section Respect for Human Rights indicates: 'The internal awareness of this mechanism is measured every year through initiatives such as the "Employee Awareness Survey" as a way to engage users and assess the current mechanism, and the current awareness rate is over 90%. We also strive to keep improving the awareness rate and accessibility of this mechanism by sharing these results (including comparisons with previous year) with our top management'. However, it is not clear how it engages with potential or actual users on the design and performance of the mechanism, as evidence seems to focus on awareness rate. [Respect for Human Rights (web), N/A: suntory.com] • Not Met: Examples (at least two) of how they do this <p>Score 2</p> <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	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Response timescales and how complainants will be informed: The Company has published its Compliance Hotline Response Flow. The Flow includes five steps such as reception reporting; determine need of research or not; determine need of corrective action; completion of corrective action; and follow up. During each step, the Company informs the result of the decision and the reason for that. [2021 CSR Group Site, 31/12/2020: suntory.com] • Met: Describe support (technical, financial,etc) available for equal access by complainants: The webpage section Respect for Human Rights indicates: 'Additionally, in order to avoid accessibility issues due to technical or financial reasons, we have made this mechanism accessible to all employees through different methods (digital and analog), including web, smartphones, telephone, and mail'. [Respect for Human Rights (web), N/A: suntory.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describe types of outcome to complainant through use of mechanism: The webpage section Respect for Human Rights indicates: 'Roughly 60% of the reports received in Japan were about labor, personnel and management issues, including human rights related issues'. However, it is not clear the types of outcomes to the complainant through use of the grievance mechanism. The focus on this indicator is on the complainant rather than the type of complaint. [Respect for Human Rights (web), N/A: suntory.com] • Not Met: Escalation to senior/independent level: The webpage section Respect for Human Rights indicates: 'If there is a suspicion of non-compliance based on the content of the report, we take into consideration the privacy protection of all persons involved in accordance with the Suntory Group Internal Reporting System Regulations. In that case, the compliance officer promptly conducts a confidential investigation within the company, and promptly requests correction while escalating to the relevant executive in charge, so that measures can be taken as soon as possible in order to avoid any negative impact to the reporter. The results of the survey are shared to the reporter and management, respectively, to promote corrective measures and prevent recurrence'. However, while the Company indicates that there is the possibility of escalation if necessary, it is not clear if escalation to more senior levels or independent third party adjudicators or mediators also entails challenging the process or outcome and that it can be done at complainant discretion. [Respect for Human Rights (web), N/A: suntory.com]
C.5	Prohibition of retaliation for raising complaints or concerns	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Public statement prohibiting retaliation: The webpage section Respect for Human Rights indicates: 'Based on our internal regulations, the Suntory Group prohibits any type of negative impact such as retaliation or spread of rumours and does not force confidentiality on the reporters'. The mechanism is available to workers and other stakeholders. [Respect for Human Rights (web), N/A: suntory.com] • Met: Practical measures to prevent retaliation: The webpage section Respect for Human Rights indicates: 'In order to achieve this, when the Compliance Office conducts an investigation it identifies the persons concerned and then confirms the "internal reporting system regulations", protecting thus the rights of the reporter. In addition, during the interviews with the reporter on the closing of each case, we also check that reporters have not suffered any disadvantages during the process. Furthermore, we are working to create a culture in which compliance reports are

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>protected not only by the persons concerned but also by the entire workplace by proactively disseminating the "internal reporting system regulations" within the company on a daily basis'. [Respect for Human Rights (web), N/A: suntory.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Company indicate it will not retaliate against workers/stakeholders • Not Met: Expects suppliers to prohibit retaliation against workers/stakeholders: The webpage section Respect for Human Rights indicates: 'Furthermore, as stated in our supplier guidelines, we expect suppliers to establish similar grievance mechanisms (with no retaliation) within their own supply chain, thereby striving to promote access to remedy upstream in our supply chain'. Workers in its supply chain and the community can access the mechanism. However, it is not clear the Company expects its suppliers to prohibit retaliation against those who represent other stakeholders for raising human rights related concerns as the Supplier Guidelines indicates: 'Suppliers are expected to have appropriate mechanisms by which employees can raise concerns protected from retaliation'. [Respect for Human Rights (web), N/A: suntory.com] & [Supplier Guidelines, 01/2022: suntory.com]
C.6	Company involvement with state-based judicial and non-judicial grievance mechanisms	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: Complainants not asked to waive rights • Met: Company does not require confidentiality provisions: The webpage section Respect for Human Rights indicates: 'Based on our internal regulations, the Suntory Group [...] does not force confidentiality on the reporters'. [Respect for Human Rights (web), N/A: suntory.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Will work with state based non judicial mechanisms • Not Met: Example of issue resolved (if applicable)
C.7	Remedying adverse impacts	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Describes how remedy has been provided • Not Met: Says how it would provide remedy for victims if no adverse impact identified <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Changes to systems, processes and practices to stop similar impact: The webpage section Respect for Human Rights indicates: 'regarding measures against harassment, which is a priority issue, in many cases there is a difference in values with colleagues and related parties, so we aim to create a culture where both sides can recognize the difference by providing an opportunity to learn about "conscious bias," and in this respect we are holding seminars to promote a more tolerant organization. [...] we are working to create a culture in which compliance reports are protected not only by the persons concerned but also by the entire workplace by proactively disseminating the "internal reporting system regulations" within the company on a daily basis'. However, no description found of changes to systems, processes and practices to prevent similar adverse impacts in the future [for adverse human rights impacts which it has caused or to which it has contributed]. [Respect for Human Rights (web), N/A: suntory.com] • Not Met: Describe approach to monitoring implementation of agreed remedy • Not Met: Approach to learning from incident to prevent future impacts
C.8	Communication on the effectiveness of grievance mechanism(s) and incorporating lessons learned	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Number grievances filed, addressed or resolved and outcome achieved: The Company reports, in its 2021 CSR Group Site, that in 2020, there were no reports on child or forced labour found through its global compliance system. On its website, it indicates that: 'In 2021, a total of 181 reports were received through these contact points in Japan and overseas (89 reports were received by Suntory Beverage & Food Group). Roughly 60% of the reports received in Japan were about labor, personnel and management issues, including human rights related issues'. However, although the Company discloses figures on the number of reports received and the percentage of it that represented labor related grievances, as well as it indicates that there were no child labor related concern raised, it is not clear the amount of human rights issues addressed or resolved and outcomes achieved for its own workers and for external individuals and communities that may be adversely impacted by the Company. [2021 CSR Group Site, 31/12/2020: suntory.com] & [Respect for Human Rights (web), N/A: suntory.com] • Not Met: How lessons from mechanism improve management system <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Evaluation of the channel/mechanism and changes made as result

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not Met: Describes procedures to address delays of outcomes agreed with stakeholders: The webpage section Respect for Human Rights indicates: 'If there is a suspicion of non-compliance based on the content of the report, [...] the compliance officer promptly conducts a confidential investigation within the company, and promptly requests correction while escalating to the relevant executive in charge, so that measures can be taken as soon as possible in order to avoid any negative impact to the reporter. The results of the survey are shared to the reporter and management, respectively, to promote corrective measures and prevent recurrence. After a certain period of time has passed after the response, we close the case once we receive a report on the state of change from senior management as a follow-up. [...] regarding measures against harassment, which is a priority issue, in many cases there is a difference in values with colleagues and related parties, so we aim to create a culture where both sides can recognize the difference by providing an opportunity to learn about "conscious bias," and in this respect we are holding seminars to promote a more tolerant organization. [...] we are working to create a culture in which compliance reports are protected not only by the persons concerned but also by the entire workplace by proactively disseminating the "internal reporting system regulations" within the company on a daily basis'. However, although the Company indicates different measures taken or to be taken, no description of the procedures it has in place to address delays or non-implementation of outcomes agreed with stakeholders. [Respect for Human Rights (web), N/A: suntory.com]

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.1.1.b	Living wage (in the supply chain)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Discloses timebound target for suppliers to pay living wage or include in code or contracts: Supplier guidelines document requires that 'wages and benefits must be in line with local legislation and meet or exceed the legal minimum standards of the country where the workers are employed'. No evidence found in relation to living wages requirements including basic needs for employee and family/dependents allowing for some discretionary income. [Supplier Guidelines, 01/2022: suntory.com] • Not Met: Improving living wage practices of suppliers <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of number affected by payment below living wage • Not Met: Provides analysis of trends demonstrating progress: The webpage section Respect for Human Rights indicates: 'A review of SAQ responses from approximately 1,000 supplier manufacturing sites showed that 8% of the responses indicated possible issues with overtime pay. The review also showed lack of visibility regarding indirect employees' minimum wage. SMETA audit findings also included 21 non-compliances related to wages and 25 non-compliances related to the management of overtime. We have engaged our suppliers and confirmed that currently there are no confirmed cases of uncorrected wage issues (the issues found had been solved)'. However, no analysis of trends found demonstrating progress on living wage (i.e year-on-year data) [Respect for Human Rights (web), N/A: suntory.com]
D.1.2	Aligning purchasing decisions with 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"> • Met: Avoids business model pressure on HRs (purchasing practices): The webpage section Basic Policy on Sustainable Procurement indicates: 'In order to avoid that our purchasing practices affect negatively the human rights of our suppliers' workers, we agree on estimated lead times in advance with our suppliers, and share our payment terms in advance'. [Respect for Human Rights (web), N/A: suntory.com] • Not Met: Practices adopted to pay suppliers in line with agreed timeframes: The webpage section Basic Policy on Sustainable Procurement indicates: 'we [...] share our payment terms in advance. We also implement the necessary mechanisms and procedures so that payments are executed on the timeframe agreed with the supplier'. However, although the Company indicates it has the necessary mechanisms and procedures so that payments are executed on the timeframe agreed with the supplier, no further description found of those mechanisms. [Respect for Human Rights (web), N/A: suntory.com] • Not Met: Review own operations to mitigate negative impact <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets all requirements under score 1

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not Met: Examples of how it assessed, addressed and change purchasing practices: The webpage section Basic Policy on Sustainable Procurement indicates: 'if we assume that there is a high human rights risk in one particular ingredient, we review our purchasing practices and strive to reduce the risk. For example, in some of our business units we switch to sustainable-certified palm oil in order to minimize human rights and environmental risks'. However, this subindicator refers to the changes where the Company's practices might undermine human rights. Current evidence seems to refer to suppliers' practices. [Respect for Human Rights (web), N/A: suntory.com]
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"> • Not Met: Identifies direct and indirect suppliers back to manufacturing sites (factories or fields): The 2021 CSR Group Site discloses the procurement ratio by supplier region. It said that 'the Suntory Group is primarily purchasing raw materials from the suppliers around the world'. Japan accounted for 45% of total suppliers, North America for 11%, Europe for 12%, Asia for 12%, and Central and South America occupied for 11%. The webpage section Basic Policy on Sustainable Procurement indicates: 'in order to increase transparency in the supply chain, from a basic purchasing practice perspective, we have formal contracts with all 1st tier suppliers and obtain basic information about those suppliers. Additionally, we try to obtain information on 2nd tier and beyond suppliers via the 1st tier supplier when possible, and carry out on-site visits of those 2nd tier and beyond suppliers'. However, although it indicates that it tries to identify 2nd tier when possible, it is not clear it is actively trying to trace all its supply chain, including both direct and indirect suppliers back to product source (e.g. farm, plantation, etc.). [2021 CSR Group Site, 31/12/2020: suntory.com] & [Basic Policy on Supply Chain Sustainability (web), N/A: suntory.com] <p>Score 2</p> <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	<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: Child Labour rules in codes or contracts: The Company states, in its Supplier Guidelines that 'suppliers must prevent child labor and comply with all applicable child labour laws, the International Labor Organization (ILO) standards'. The webpage section Respect for Human Rights indicates: 'We regard child labor as one of the key human rights risks in supply chains, and are strengthening management of suppliers through Sedex and SMETA information. For example, we use the questions in Sedex to identify direct and indirect workers who may be considered underage workers (under 15). In addition, based on actual on-site audits conducted through SMETA, we confirmed that worker age verification is being performed properly, and corrective actions are being taken when issues become apparent'. However, no details found in relation to requirement of remedy programmes in place. [Supplier Guidelines, 01/2022: suntory.com] & [Respect for Human Rights (web), N/A: suntory.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of number affected by child labour in supply chain • Not Met: Analysis of trends in progress made: The webpage section Respect for Human Rights indicates: 'A review of SAQ responses from approximately 1,000 manufacturing sites indicated that there was no child labor by those under the age of 15. At 5% of plants, there were workers of ages 16-17, which by itself is a legal working age on the countries where those workers were found. The findings of one SMETA audit also noted a 17-year-old worker, but we have confirmed that this was not a problem under local law. 4 instances of inadequate worker age records were also noted, but we have engaged the suppliers and confirmed that the recording methods have been corrected'. However, no analysis of trends found demonstrating progress child labour related issues. (i.e year-on-year data showing evolution). [Respect for Human Rights (web), N/A: suntory.com]
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"> • Not Met: Debt and fees rules in codes or contracts: Although the Company established Supplier Guideline, it only refer to 'prevent involuntary labour and any form of human trafficking' [Supplier Guidelines, 01/2022: suntory.com] • Not Met: How working with suppliers on debt & fees <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of the number affected by payment of recruitment fees

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not Met: Analysis of trends in progress made: Regarding recruitment fees, the webpage section Respect for Human Rights indicates: 'A review of SAQ responses from approximately 1,000 supplier manufacturing sites showed that 1% of the respondents had no initiatives to address the burden of recruitment fees on workers. In addition, 3% of the respondents indicated that the workers bear costs in some form. Two SMETA audit also found non-compliances related to the burden of recruitment fees on workers, but we confirmed that this has already been addressed by revising the supplier's internal regulations. Similarly, there were three findings regarding wage reductions, but we confirmed that there were no deductions that were problematic under local law'. However, although the Company discloses some of its assessment results in relation to recruitment fees, no analysis of trends demonstrating progress found. [Respect for Human Rights (web), N/A: suntory.com]
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"> • 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 <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of the number affected by failure to pay directly • Not Met: Provides analysis of trends demonstrating progress: Regarding wages, the webpage section Respect for Human Rights indicates: 'A review of SAQ responses from approximately 1,000 supplier manufacturing sites showed that 8% of the responses indicated possible issues with overtime pay. The review also showed lack of visibility regarding indirect employees' minimum wage. SMETA audit findings also included 21 non-compliances related to wages and 25 non-compliances related to the management of overtime. We have engaged our suppliers and confirmed that currently there are no confirmed cases of uncorrected wage issues (the issues found had been solved)'. However, although the Company discloses some of its assessment results in relation to wages, no analysis of trends demonstrating progress found. [Respect for Human Rights (web), N/A: suntory.com]
D.1.5.f	Prohibition of forced labour: Restrictions on workers (in the supply chain)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Free movement rules in codes or contracts: Supplier guidelines document requires that 'suppliers must prevent involuntary labor and any form of human trafficking'. No further details found. [Supplier Guidelines, 01/2022: suntory.com] • Not Met: How working with suppliers on free movement <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of the number affected by retaining docs or restricting movement • Not Met: Provides analysis of trends demonstrating progress: Regarding freedom of movement, the webpage section Respect for Human Rights indicates: 'No risk information regarding freedom of movement was found in the SAQ responses or the SMETA audit'. No analysis of trends demonstrating progress son restrictions on workers found. [Respect for Human Rights (web), N/A: suntory.com]
D.1.6.b	Freedom of association and collective bargaining (in the supply chain)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: FoA & CB rules in codes or contracts: It is stated that 'we established the Suntory Group's Basic Policy on the CSR Supply Chain that consists of six main pillars - legal compliance, human rights and labor standards, (...) - that address global issues such as child labor, forced labor, freedom of association and collective bargaining, working hours'. However, it does not include the prohibition of intimidation, harassment, retaliation and violence against union members and union representatives. [2021 CSR Group Site, 31/12/2020: suntory.com] & [Supplier Guidelines, 01/2022: suntory.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not Met: How working with suppliers on FoA and CB: Regarding freedom of Association and Collective Bargaining, the webpage section Respect for Human Rights indicates: ‘We consider impediments to freedom of association and collective bargaining to be one of the key human rights risks in supply chains, and are strengthening management of suppliers through Sedex and SMETA information to prevent infringement of these rights. For example, we leverage questions in Sedex to check the presence of labor unions, as well as processes and organizations in which workers can participate and have their participation reflected in decision-making by the supplier company. In addition, we confirm through SMETA audit data whether the rights to freedom of association and collective bargaining are being protected, and engage in corrective actions when issues become apparent and are uncorrected’. However, no description found of how it proactively works to support and improve the practices of its suppliers in relation to freedom of association and collective bargaining. Current evidence seems to refer to monitor compliance with requirements. [Respect for Human Rights (web), N/A: suntory.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of the number affected by restrictions to FoA and CB in the SP • Not Met: Provides analysis of trends demonstrating progress: The webpage section Respect for Human Rights indicates: ‘On the point of whether processes, organizations, and arrangements were in place for workers to use and reflect in company decision making, the SAQ data indicated that 12% of supplier manufacturing sites did not have these mechanisms in place. In addition, data from the SMETA audit included three findings related to freedom of association and collective bargaining, but we have confirmed that corrections have already been made’. However, no an analysis of trends demonstrating progress found (i.e year-on-year data showing evolution) [Respect for Human Rights (web), N/A: suntory.com]
D.1.7.b	Health and safety: Fatalities, lost days, injury, occupational disease rates (in the supply chain)	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Sets out clear Health and Safety requirements: The Company states in its Supplier Guidelines that its suppliers must have a health & safety policy, identify any hazards in the workplace, manage them and communicate any potential dangers to the employees. [Supplier Guidelines, 01/2022: suntory.com] • Not Met: Injury Rate or Lost days or Near miss disclosures for last reporting period: The Company reports that lost time injury/illness frequency rate was 0.20 in 2020. However, it has not reported data for workers at suppliers. [2021 CSR Group Site, 31/12/2020: suntory.com] • Not Met: Fatalities rate for lasting reporting period: The Company reports the number of accidents resulting fatality was 0 in 2020. However, it has not reported data for workers at suppliers. [2021 CSR Group Site, 31/12/2020: suntory.com] • Not Met: Occupation disease rate for last reporting period <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: How working with suppliers on H&S: In regard to Health and Safety, the webpage section Respect for Human Rights indicates: ‘We will engage with these high-risk supplier manufacturing sites and work toward enhancing their occupational safety. Data from the SMETA audit also showed 64 non-compliances, with remedial actions having already been taken on 55 of them. We will continue to engage with suppliers on the remaining 9 issues for which corrective actions are still pending. Corrective actions for the health and safety risks found through the Sedex's SAQ answers and non-compliance by SMETA were shared with other suppliers to improve health and safety management’. However, although the Company indicates it would engage and work with suppliers, it is not clear how the work would take place. This indicator looks for description of proactive work with its supply chain to improve their practices in relation to health and safety. Most part of the evidence refers to remedying non-compliances found. [Respect for Human Rights (web), N/A: suntory.com] • Not Met: Assessment of the number affected by H&S issues in the SP • Not Met: Provides analysis of trends demonstrating progress: The Company indicates: ‘The SAQ data showed that 2% of production plants had more than 100 recorded accidents in the past 12 months, in which 1% reported more than 20 serious accidents’. However, no analysis of trends demonstrating progress found (i.e yea-on-year data showing evolution). [Respect for Human Rights (web), N/A: suntory.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.1.8.b	Land rights: Land acquisition (in the supply chain)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Rules on land & owners in codes or contracts • Not Met: How working with suppliers on land issues: In regard to Land Rights, the webpage section Respect for Human Rights indicates: 'We are strengthening management of suppliers through Sedex information to identify human rights risks related to land rights. Specifically, we leverage questions in Sedex to determine whether the land on which a given supplier's production plant is sited was used as a residence before construction. The SAQ results showed that 1% of such land was used for residential buildings prior to conversion to an industrial site. We will engage with the suppliers to confirm whether there is a possibility that the conversion could have led to a violation of land rights'. However, it is not clear how it proactively works with suppliers to improve their practices in relation to land use/ acquisition. Current evidence seems to refer to monitoring. [Respect for Human Rights (web), N/A: suntory.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Includes resettlement requirements that the supplier provides financial compensation • Not Met: Assessment of the number affected by land rights issues in its SP • Not Met: Provides analysis of trends demonstrating progress: As it is indicated above: 'We are strengthening management of suppliers through Sedex information to identify human rights risks related to land rights. Specifically, we leverage questions in Sedex to determine whether the land on which a given supplier's production plant is sited was used as a residence before construction. The SAQ results showed that 1% of such land was used for residential buildings prior to conversion to an industrial site'. However, no analysis of trends demonstrating progress in regard to land acquisition found. [Respect for Human Rights (web), N/A: suntory.com]
D.1.9.b	Water and sanitation (in the supply chain)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Rules on water stewardship in codes or contracts: The supplier guidelines document states that suppliers are expected to control water use, don't release water directly into nature and encourages engagement on conservation of water resources. No evidence found, however, in relation to 'refraining from negatively affecting access to safe water'. [Supplier Guidelines, 01/2022: suntory.com] • Not Met: How working with suppliers on water stewardship issues: The webpage section Respect for Human Rights indicates: 'We are strengthening management of suppliers through Sedex data to understand risks related to the water access and sanitation rights of local communities . For example, we leverage questions in Sedex to check various pollution risks (soil, rivers, etc.) from supplier operations, their water usage volumes, whether they manage wastewater, and management of water quality impacts on local areas'. However, it is not clear how it works with suppliers to improve their practices in relation to access to water and sanitation. [Respect for Human Rights (web), N/A: suntory.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment on the number affected by lack of access to water and sanitation • Not Met: Provides analysis of trends demonstrating progress: In regard to water, the webpage section Respect for Human Rights indicates: 'The SAQ results showed that 2% of the manufacturing plants were not managing quality of their wastewater. The SMETA audit data showed two non-compliances, one of which has already been corrected. For the other, we are working with the supplier to solve the issue'. However, no analysis of trends demonstrating progress in relation to water and sanitation found. [Respect for Human Rights (web), N/A: suntory.com]
D.1.10.b	Women's rights (in the supply chain)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Women's rights in codes or contracts • Not Met: How working with suppliers on women's rights: The webpage section Respect for Human Rights indicates: 'We are strengthening management of suppliers through Sedex data to identify risks related to women's rights. For example, we leverage questions in Sedex to check the ratio of male to female workers, the ratio of female managers, whether anti-discrimination policies are in place, and rates of absenteeism and turnover among female workers'. However, it is not clear how it proactively works with suppliers to improve their practices in relation to women's rights. [Respect for Human Rights (web), N/A: suntory.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment on the number affected by discrimination or unsafe working conditions • Not Met: Provides analysis of trends demonstrating progress: The webpage section Respect for Human Rights indicates: ‘The SAQ data showed that 5% of manufacturing sites did not have separate washing facilities for men and women, 5% of manufacturing sites had a turnover rate among female workers of more than 50% during the previous year, and 2% of manufacturing sites had an absenteeism rate among female workers of more than 30% during the previous year. The data from the SMETA audits, however, did not confirm any non-compliance in this respect’. However, no analysis of trends demonstrating progress on women’s rights found. [Respect for Human Rights (web), N/A: suntory.com]

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 21.79 out of 80 points scored in themes A-D has been applied to produce a score of 5.45 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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