



### Corporate Human Rights Benchmark 2023 Company Scorecard

ANTA International Group Holdings
Apparel (supply chain and own operations)
8.3 out of 100

Theme score	Out of	For theme
0.2	10	A. Governance and Policy Commitments
0.5	25	B. Embedding Respect and Human Rights Due Diligence
3.5	20	C. Remedies and Grievance Mechanisms
2.5	25	D. Performance: Company Human Rights Practices
1.7	20	E. Performance: Responses to Serious Allegations

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

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

## **Detailed assessment**

### A. Governance and Policy Commitments (10% of Total)

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1.1	Commitment to respect human rights	0	The individual elements of the assessment are met or not as follows: Score 1 • Not Met: General HRs commitment: The 2021 Environmental, Social and Governance Report indicates: 'As a member of the United Nations Global Compact, we follow "Universal Declaration of Human Rights" of United Nations and the "International Bill of Human Rights" to fully protect the legitimate rights and interests of our employees'. However, "ESG report" is not considered a suitable source for policy statements under CHRB's revised approach. [2021 Environmental, Social and Governance Report, 18/05/2022: manager.wisdomir.com] • Not Met: Universal Declaration of Human Rights (UDHR) • Not Met: International Bill of Human Rights Score 2 • Not Met: Commitment to UNGPs • Not Met: Commitment to OECD MNE Guidelines
A.1.2.a	Commitment to respect the human rights of workers: ILO Declaration on Fundamental Principles and Rights at Work	0	<ul> <li>The individual elements of the assessment are met or not as follows:</li> <li>Score 1</li> <li>Not Met: Commitment to ILO core principles</li> <li>Not Met: Explicitly lists all four ILO core principles</li> <li>Score 2</li> <li>Not Met: Expects suppliers to commit to ILO core principles: The Code of Conduct for Suppliers has explicit requirements regarding the following ILO core areas: discrimination, forced labour, child labour, freedom of association. No evidence found in the code an explicit commitment to Collective bargaining, or a general</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul> <li>commitment to Comply with the ILO Fundamental Principles and Rights at work [Supplier Handbook, 08/02/2023: ir.anta.com]</li> <li>Not Met: Explicitly lists all four ILO core principles for suppliers: The Code of Conduct for Suppliers, which is inside the Supplier Handbook includes: Prohibition of child labour; Prohibition of forced or involuntary labour; Prohibition of discrimination; No disciplinary measures; Freedom of association and collective bargaining. As for freedom of association and collective bargaining, it notes: 'Suppliers must respect the legitimate rights of employees to choose, form, join or refuse to join a labour union or other type of collective organisation, and to participate in relevant activities'. However, no explicit commitment found to respect collective bargaining despite being indicated on the heading. Although the handbook has provisions on collective bargaining, these are part of the standards, not the formal code of conduct for suppliers. [Supplier Handbook, 08/02/2023: ir.anta.com]</li> </ul>
A.1.2.b	Commitment to respect the human rights of workers: Health and safety and working hours	0.5	The individual elements of the assessment are met or not as follows: Score 1 • Not Met: Commitment to respect H&S of workers: No policy statement found committing it to respect the health and safety of workers. CHRB no longer considers ESG reports a suitable source for policy statements. • Not Met: Commitment to ILO working hours standards or 48 hour regular work week Score 2 • Met: Expects suppliers to commit to H&S of workers: The Code of Conduct for Supplier indicates: 'Suppliers shall provide employees with a healthy, sanitary and safe workplace that complies with local laws and regulations. Employees must be given access to clean drinking water and public sanitation facilities, and all public places must be equipped with adequate medical kits, emergency exits and safety protection equipment. Any employee dormitory must also meet these requirements. Employees must be properly trained to prevent accidents and injury to health out of or occurring during work'. [Supplier Handbook, 08/02/2023: ir.anta.com] • Not Met: Expects suppliers to commit to ILO working hours standards or 48 hour regular work week: The Code of Conduct for Suppliers indicates: 'Suppliers shall adopt reasonable working hours in accordance with relevant national laws, regulations and/or relevant provisions in the places where they operate. [] Suppliers shall pay employees salary not lower than the local minimum standard and overtime wage and provide legal benefits in accordance with relevant national laws, regulations and/or relevant provisions in the places where they operate'. 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.
A.1.3.AP	Commitment to respect human rights particularly relevant to the sector – vulnerable groups (AP)	0	<ul> <li>[Supplier Handbook, 08/02/2023: <u>ir.anta.com</u>]</li> <li>The individual elements of the assessment are met or not as follows:</li> <li>Score 1</li> <li>Not Met: Commitment to women's rights</li> <li>Not Met: Commitment to migrant worker's rights</li> <li>Not Met: Commitment to migrant worker's rights</li> <li>Not Met: Expects suppliers to respect these rights: The Supplier Handbook indicates: 'Suppliers shall not require an employee to have a pregnancy test, unless required by law or local government. A pregnancy test shall not be made a precondition of employment. Suppliers shall not force or compel workers to use contraceptives. If employees are pregnant during the term of employment, they shall be entitled to all legal protections and benefits. Female employees are entitled to maternity leave in accordance with local laws. Workers on maternity leave shall not face the threat of dismissal, loss of seniority, or pay cut and shall receive the same remuneration and benefits as before when they return to their job posts'. However, although the Code of Conduct for Suppliers is inside the Supplier Handbook, this provision is not part of the Code. Commitments are expected to be placed in Company policy documents or codes, not in handbooks according to CHRB revised methodology. It is not clear the Company expects suppliers to respect children's rights or migrant workers' rights. [Supplier Handbook, 08/02/2023: <u>ir.anta.com</u>]</li> <li>Score 2</li> <li>Not Met: Commitment refers to CEDAW/Women's Empowerment Principles</li> <li>Not Met: Commitment refers to Convention on migrant workers</li> <li>Not Met: Commitment refers to respect these rights</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1.4	Commitment to remedy	0	The individual elements of the assessment are met or not as follows: Score 1 • Not Met: Commitment to remedy adverse HRs impacts • Not Met: Expects suppliers to make this commitment: The Supplier Handbook indicates: 'If any supplier is found to have any zero-tolerance problem in the annual evaluation, the supplier will be warned within the system and given one month for rectification, and the Procurement Department will be simultaneously notified for new supplier reserve. The Supplier Management Department will conduct on-site inspection within one month. If the zero-tolerance problem is still unresolved, the Supplier Management Department will initiate the supplier withdrawal procedure within one month and completely terminate the cooperation within six months. The supplier that ANTA Sports terminates the cooperation for having any zero- tolerance problem shall not be used again within two years. If the zero-tolerance problem has been remediated or corrected upon acceptance by the Supplier Management Department, the supplier shall be subject to CAP follow-up audit (three months) and semi-annual monitoring for two consecutive years'. However, it is not clear the Company expects suppliers to commit 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. Current evidence seems to focus in specific follow-up measures on audit findings. [Supplier Handbook, 08/02/2023: <u>ir.anta.com</u> ] Score 2 • Not Met: Commitment to collaborate with judicial or non-judicial mechanisms • Not Met: Commitment to work with suppliers on remedy [Supplier Handbook, 08/02/2023: <u>ir.anta.com</u> ]
A.1.5	Commitment to respect the rights of human rights defenders	0	The individual elements of the assessment are met or not as follows: Score 1 • Not Met: Zero tolerance of threats/attacks on HRDs • Not Met: Expects suppliers to make this commitment Score 2 • Not Met: Commitment to working with HRDs to create safe and enabling environment

### A.2 Board Level Accountability (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.2.1	Commitment from the top	0	The individual elements of the assessment are met or not as follows: Score 1 • Not Met: Board level responsibility for HRs • Not Met: Describes HRs expertise of Board member Score 2 • Not Met: Board member/CEO signal importance of HRs in their communications
A.2.2	Board responsibility	0	<ul> <li>The individual elements of the assessment are met or not as follows:</li> <li>Score 1 <ul> <li>Not Met: Process to review HRs strategy at board level</li> <li>Not Met: Example of HRs issues/trends discussed in last reporting period</li> <li>Score 2 <ul> <li>Not Met: Meets both requirements under score 1</li> <li>Not Met: Describes how affected stakeholders / HRs experts inform board discussions</li> </ul> </li> </ul></li></ul>
A.2.3	Incentives and performance management	0	The individual elements of the assessment are met or not as follows: Score 1 • Not Met: At least one board member incentive linked to HRs commitments • Not Met: Incentive scheme linked to key HRs risks beyond employee H&S Score 2 • Not Met: Performance criteria linked to HRs made public • Not Met: Review of other board incentives for coherence with HRs policies
A.2.4	Business model strategy and risks	0	<ul> <li>The individual elements of the assessment are met or not as follows:</li> <li>Score 1</li> <li>Not Met: Board process to review business model and strategy for HRs risks</li> <li>Not Met: Describes frequency and triggers for reviewing business model</li> <li>Score 2</li> <li>Not Met: Meets both requirements under score 1</li> <li>Not Met: Example of actions resulting from reviews</li> </ul>

# **B. Embedding Respect and Human Rights Due Diligence (25% of Total)** B.1 Embedding Respect for Human Rights in Company Culture and Management Systems (10% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.1	Responsibility		The individual elements of the assessment are met or not as follows: Score 1
	and resources		Not Met: Score of 1 on A.1.2.a
	for day-to-day		Not Met: Senior responsibility for HRs implementation and decision making
	human rights	0	Score 2
	functions		Not Met: Describes day-to-day responsibility for implementing HRs commitments
			• Not Met: Day-to-day resources and expertise allocation in own operations
			• Not Met: Resources and expertise allocation in supply chain
B.1.2	Incentives and		The individual elements of the assessment are met or not as follows:
	performance		Score 1
	management		• Not Met: Senior manager incentives linked to HRs commitments: The Company
			indicates it has a long-term incentive scheme applicable to employees at the
			manager level or above, however, no information related to its criteria was found.
		0	[2022 Environmental, Social and Governance Report: manager.wisdomir.com]
			Not Met: Incentive scheme linked to key HRs risks beyond employee H&S
			Score 2
			Not Met: Performance criteria linked to HRs made public
			• Not Met: Review of other senior management incentives for coherence with HRs policies
D 1 2	Internetica		The individual elements of the assessment are met or not as follows:
B.1.3	Integration		Score 1
	with enterprise		• Not Met: HRs risks integrated as part of enterprise risk system: The Company
	risk		describes its Human Rights as one of the risk issues covered by its ESG Risk
	management		Management, however, no description of how this is integrated in the overarching
		0	enterprise risk system was found. [2022 Environmental, Social and Governance
			Report: manager.wisdomir.com]
			Not Met: Provides an example
			Score 2
			Not Met: Risk assesment by Audit Committee or independent third party
B.1.4.a	Communication		The individual elements of the assessment are met or not as follows:
	/dissemination		Score 1
	of policy		• Not Met: Score of 1 on A.1.2.a
	commitment(s)		Not Met: Communicates HRs policies to all workers in own operations: The
to workers	to workers and		Company indicates that it trains its employees in its policies, however, no
	external	0	information related to a human rights policy and to how it communicates these
	stakeholders		policies in other languages was found . [2022 Environmental, Social and
	statienenene		Governance Report: <u>manager.wisdomir.com</u> ] Score 2
			Not Met: Communicates HRs policies to stakeholders
			Not Met: Example of how HRs policies are accessible for intended audience
B.1.4.b	Communication		The individual elements of the assessment are met or not as follows:
0.1.4.0	/dissemination		Score 1
	of policy		Not Met: Meets ILO requirement for suppliers on A.1.2.a
			• Not Met: Describes steps to communicate HRs policies to supply chain
	commitment(s)	0	Not Met: Requires suppliers to communicate HRs policies
	to business		Score 2
	relationships		• Not Met: Describes how HRs policies are contractual/binding for suppliers
			• Not Met: Requires suppliers to cascade contractual/binding HRs policies to its
			suppliers
B.1.5	Training on		The individual elements of the assessment are met or not as follows:
	Human Rights		Score 1
			Not Met: Score of at least 1 on A.1.2.a
	1		<ul> <li>Not Met: Describes how workers are trained on HRs policy commitments</li> </ul>
			Not Met: Trains relevant managers including procurement on HRs
			Not Met: Trains relevant managers including procurement on HRs Score 2
		0	<ul> <li>Not Met: Trains relevant managers including procurement on HRs</li> <li>Score 2</li> <li>Not Met: Score of 2 on A.1.2.a</li> </ul>
		0	<ul> <li>Not Met: Trains relevant managers including procurement on HRs</li> <li>Score 2</li> <li>Not Met: Score of 2 on A.1.2.a</li> <li>Not Met: Meets both requirements under score 1</li> </ul>
		0	<ul> <li>Not Met: Trains relevant managers including procurement on HRs Score 2</li> <li>Not Met: Score of 2 on A.1.2.a</li> <li>Not Met: Meets both requirements under score 1</li> <li>Not Met: Trains suppliers to meet HRs commitments: The Company indicates that</li> </ul>
		0	<ul> <li>Not Met: Trains relevant managers including procurement on HRs Score 2</li> <li>Not Met: Score of 2 on A.1.2.a</li> <li>Not Met: Meets both requirements under score 1</li> <li>Not Met: Trains suppliers to meet HRs commitments: The Company indicates that it regularly conducts corporate social responsibility training for all suppliers, and</li> </ul>
		0	<ul> <li>Not Met: Trains relevant managers including procurement on HRs Score 2</li> <li>Not Met: Score of 2 on A.1.2.a</li> <li>Not Met: Meets both requirements under score 1</li> <li>Not Met: Trains suppliers to meet HRs commitments: The Company indicates that it regularly conducts corporate social responsibility training for all suppliers, and this training is indicated to include human rights. However, no human rights policy</li> </ul>
		0	<ul> <li>Not Met: Trains relevant managers including procurement on HRs Score 2</li> <li>Not Met: Score of 2 on A.1.2.a</li> <li>Not Met: Meets both requirements under score 1</li> <li>Not Met: Trains suppliers to meet HRs commitments: The Company indicates that it regularly conducts corporate social responsibility training for all suppliers, and</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.6	Monitoring and corrective actions	0	The individual elements of the assessment are met or not as follows: Score 1 • Not Met: Score of at least 1 on A.1.2.a • Not Met: Monitors implementation of HRs policy commitments across global ops and supply chain: The Company indicates that it does an annual supplier evaluation, which is conducted according to the current audit score, the number of non-conformities found and the risk level of the nonconformities. As more critical issues are identified, the supplier shall face more audits per year. Human Rights is indicated as a critical or zero-tolerance item, which in this system implies three months as a period for improvement or immediate action to correct any basic human rights violation. However, no information related to monitoring its own global operations. [Supplier Handbook, 08/02/2023: <u>ir.anta.com</u> ] • Not Met: Discloses % of supply chain monitored • Not Met: Describes how workers are involved in monitoring Score 2 • Not Met: Score of 2 on A.1.2.a • Not Met: Describes corrective actions process • Not Met: Discloses findings and number of correction action processes
B.1.7	Engaging and terminating business relationships	0.5	The individual elements of the assessment are met or not as follows: Score 1 • Not Met: HRs performance affects selection suppliers • Met: HRs performance affects continuation supplier relationships: The Company indicates that if a human rights issue identified in its supply chain is not corrected in the given period, and if non-compliance persists, it will terminate its business relationship with its supplier. [Supplier Handbook, 08/02/2023: <u>ir.anta.com</u> ] Score 2 • Not Met: Describes positive HRs incentives for business relationships • Not Met: Works with suppliers to meet HRs requirements
B.1.8	Approach to engagement with affected stakeholders	0	The individual elements of the assessment are met or not as follows: Score 1 • Not Met: Describes how workers and communities identified and engaged in the last two years • Not Met: Discloses stakeholders whose HRs may be affected • Not Met: Provides two examples of engagement with stakeholders Score 2 • Not Met: Analysis of stakeholder views on company's HRs issues • Not Met: Describes how stakeholders views influenced company's HRs approach

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.1	Identifying human rights risks and impacts	0	The individual elements of the assessment are met or not as follows: Score 1 • Not Met: Describes process of identifying risks in own operations • Not Met: Describes process for identifying risks in business relationships: The Company indicates that it conducts audits in its supply chain that cover human rights, however, no information related to the identification of human rights risks and impacts was found. [Supplier Handbook, 08/02/2023: ir.anta.com] Score 2 • Not Met: Describes global risk identification system incl. stakeholder consultation • Not Met: Describes how risk identification system is triggered by new circumstances • Not Met: Describes risks identified in relation to new circumstances
B.2.2	Assessing human rights risks and impacts	0	The individual elements of the assessment are met or not as follows: Score 1 • Not Met: Describes assessment process and discloses salient HRs risks • Not Met: Describes how process applies to supply chain • Not Met: Public disclosure of results of HRs risk assessment Score 2 • Not Met: Meets all requirements under score 1 • Not Met: Describes how assessment involved affected stakeholders
B.2.3	Integrating and acting on human rights risks and impact assessments	0	The individual elements of the assessment are met or not as follows: Score 1 • Not Met: Describes system to prevent, mitigate and remediate HRs issues • Not Met: Describes how global system applies to supply chain • Not Met: Example of actions decided on at least 1 salient HRs issue Score 2 • Not Met: Meets all requirements under score 1

Indicator Code	Indicator name	Score (out of 2)	Explanation
			Not Met: Describes how stakeholders involved in decisions about actions taken
B.2.4	Tracking the effectiveness of actions to respond to human rights risks and impacts	0	<ul> <li>The individual elements of the assessment are met or not as follows:</li> <li>Score 1</li> <li>Not Met: Describes system for evaluation effectiveness of actions</li> <li>Not Met: Example of lessons learned from evaluation effectiveness of actions</li> <li>Score 2</li> <li>Not Met: Meets all requirements under score 1</li> <li>Not Met: Involves stakeholders in evaluation effectiveness of actions</li> </ul>
B.2.5	Communicating on human rights impacts	0	The individual elements of the assessment are met or not as follows: Score 1 • Not Met: Provides two examples of comms with stakeholders Score 2 • Not Met: Describes challenges to effective comms and how it is working to address them

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.1	Indicator name Grievance mechanism(s) for workers	Score (out of 2)	<ul> <li>Explanation</li> <li>The individual elements of the assessment are met or not as follows: Score 1</li> <li>Met: Grievance mechanism accessible to all workers: The Company indicates it provides multiple options of 7×24 independent reporting channels for whistleblowers, including email, hotline, WeChat and mailbox, which are available for all its workers. [2022 Environmental, Social and Governance Report: manager.wisdomir.com]</li> <li>Score 2</li> <li>Not Met: Grievance mechanism available in appropriate languages and workers made aware</li> <li>Met: Describes how workers in supply chain access grievance mechanism: The grievance mechanism is indicated to be open to suppliers and the Company also states that its suppliers shall have effective grievance procedures in place to enable workers to raise their concerns. [2022 Environmental, Social and Governance Report: manager.wisdomir.com] &amp; [Supplier Handbook, 08/02/2023: ir.anta.com]</li> <li>Met: Expects suppliers to convey expectation to their suppliers: The Company states that its suppliers shall ensure that all sub-suppliers that manufacture ANTA Sports' products have posted and trained their employees on the grievance</li> </ul>
C.2	Grievance mechanism(s) for external individuals and communities	0	<ul> <li>mechanism. [Supplier Handbook, 08/02/2023: <u>ir.anta.com</u>]</li> <li>The individual elements of the assessment are met or not as follows:</li> <li>Score 1</li> <li>Not Met: Grievance mechanism accessible to all external individuals and communities: The Company indicates the mechanism is available for other persons 'or entities who deal with the Group (e.g. customers and suppliers)'. However, it is unclear I this includes communities. [2022 Environmental, Social and Governance Report: <u>manager.wisdomir.com</u>]</li> <li>Score 2</li> <li>Not Met: Grievance mechanism available in appropriate languages and affected stakeholders made aware</li> <li>Not Met: Describes how external individuals/communities access grievance mechanism: The Company indicates that the Grievance Mechanism for Corporate Social Responsibility of Suppliers is available to any directly affected individual or organization. However, it is not clear whether stakeholders affected by conduct of the Company's suppliers have access to the mechanism. [Supplier Handbook, 08/02/2023: <u>ir.anta.com</u>]</li> <li>Not Met: Expects supplier to convey expectation to their suppliers</li> </ul>
C.3	Users are involved in the design and performance of the mechanism(s)	0	The individual elements of the assessment are met or not as follows: Score 1 • Not Met: Describes how users engaged on design and performance • Not Met: Provides user engagement examples (at least two) on design and performance Score 2 • Not Met: Describes how users engaged on improvement of mechanism • Not Met: Provides user engagement examples (at least two) on improvement
C.4	Procedures related to the mechanism(s) are equitable, publicly	0	The individual elements of the assessment are met or not as follows: Score 1 • Not Met: Describes procedure and timescales for managing complaints or concerns: The Company describes its handling of reports process, however, no timescales for addressing the complaints and for informing the complainant were found. [Whistleblowing Policy, 30/12/2022: <u>ir.anta.com</u> ]

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.5	available and explained Prohibition of		<ul> <li>Not Met: Describes technical, financial, advisory support to enable equal access Score 2</li> <li>Not Met: Describe types of outcome to complainant through use of mechanism</li> <li>Not Met: Describes escalation to senior levels / independent adjudicators: The Company indicates that the Investigation findings concerning the report shall be reported to the Risk Management Committee, which will make recommendations to the Board on actions to be taken. However, no evidence was found that this process challenges the process of outcome. [Whistleblowing Policy, 30/12/2022: <u>ir.anta.com</u>]</li> <li>The individual elements of the assessment are met or not as follows:</li> </ul>
	retaliation for raising complaints or concerns	1.5	<ul> <li>Score 1</li> <li>Met: Public statement prohibiting retaliation against workers/stakeholders: The Company states in its Whistleblowing Policy, which covers stakeholders, that it strictly prohibits any retaliation and that persons who victimize or retaliate against those who have genuinely raised concerns in good faith will be subject to disciplinary actions. [Whistleblowing Policy, 30/12/2022: ir.anta.com]</li> <li>Met: Describes practical measures to prevent retaliation: It is indicated that the whistleblower may report anonymously or under a pseudonym. [Whistleblowing Policy, 30/12/2022: ir.anta.com]</li> <li>Score 2</li> <li>Not Met: Specifies no legal action, firing or violence</li> <li>Met: Expects suppliers to prohibit retaliation against workers/stakeholders: The Company states that it prohibits any supplier or manager from retaliating against the complainants. [Supplier Handbook, 08/02/2023: ir.anta.com]</li> </ul>
C.6	Company involvement with state- based judicial and non- judicial grievance mechanisms	0	<ul> <li>The individual elements of the assessment are met or not as follows:</li> <li>Score 1</li> <li>Not Met: Complainants not asked to waive legal rights</li> <li>Not Met: Does not require confidentiality provisions</li> <li>Score 2</li> <li>Not Met: Cooperates with state based non judicial mechanisms</li> <li>Not Met: Example of issue resolved (if applicable)</li> </ul>
C.7	Remedying adverse impacts	0	The individual elements of the assessment are met or not as follows: Score 1 • Not Met: Describes approach taken to remedy adverse HRs impacts • Not Met: Describes how remedy would be provided if no adverse impact identified Score 2 • Not Met: Describes changes to systems, processes and practices to prevent future impacts • Not Met: Describes approach to monitoring/implementing agreed remedy • Not Met: Describes approach to learning from incidents if no adverse impacts identified
C.8	Communication on the effectiveness of grievance mechanism(s) and incorporating lessons learned	0.5	The individual elements of the assessment are met or not as follows: Score 1 • Met: Discloses number of grievances filed, addressed or resolved and outcomes achieved: The Company states it received no complaints about human rights issues. [2022 Environmental, Social and Governance Report: manager.wisdomir.com] • Not Met: Example of how lessons from mechanism improved HRs management system Score 2 • Not Met: Describes process to evaluate mechanism and changes made as a result: The Company states that the Risk Management Committee shall regularly review the implementation and effectiveness of the Whistleblowing Policy, however, no information related to how this review process happens and to any changes made to improve the grievance mechanism based on the review were found. [Whistleblowing Policy, 30/12/2022: ir.anta.com] • Not Met: Decribes procedures to address delays of outcomes agreed with stakeholders

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.2.1.a	Living wage (in		The individual elements of the assessment are met or not as follows:
	own production		Score 1
	or		• Not Met: Pays living wage or sets time-bound target: The Company states that
	manufacturing		'ANTA Sports encourages its suppliers to pay their employees remuneration not
	operations)	0	lower than a living wage.' However there is no indication that it pays a living wage.
	operations		<ul> <li>Not Met: Describes how living wage determined</li> </ul>
			Score 2
			<ul> <li>Not Met: Achieved paying a living wage</li> </ul>
			Not Met: Reviews definition living wage with unions
D.2.1.b	Living wage (in		The individual elements of the assessment are met or not as follows:
	the supply		Score 1
	chain)		Not Met: Requirements on living wage in supplier codes and contracts: The
			Company states that it encourages its suppliers to pay their employees
		0	remuneration not lower than a living wage, however, no requirement was found.
		_	[Supplier Handbook, 08/02/2023: ir.anta.com]
			Not Met: Describes work with suppliers on living wage
			Score 2
			• Not Met: Assessment of scope of payment below living wage in supply chain
			Not Met: Analysis of trends demonstrating progress
D.2.2	Aligning		The individual elements of the assessment are met or not as follows:
	purchasing		Score 1
	decisions with		Not Met: Describes practices to avoid price or short notice requirements that
	human rights		undermine HRs
		0	Not Met: Describes practices to pay suppliers in line with agreed timeframes
			Not Met: Reviews own operations to mitigate negative impact of purchasing
			practices
			Score 2
			Not Met: Meets all requirements under score 1     Not Met: Example of accessing and changing of nurshasing practices
<b>D</b> 2 2			Not Met: Example of assessing and changing of purchasing practices The individual elements of the assessment are met or not as follows:
D.2.3	Mapping and		Score 1
	disclosing the		Not Met: Identifies direct and indirect suppliers including manufacturing sites
	supply chain	0	Score 2
		U	Not Met: Discloses names and locations of significant parts of supply chain and
			how significance was defined
			Not Met: Discloses direct or indirect suppliers involved in higher-risk activities
D.2.4.a	Prohibition of		The individual elements of the assessment are met or not as follows:
D.2.4.a			Score 1
	child labour:		Met: Indicates it does not use child labour: The Company states that it prohibits
	Age verification		child labor in any of its operations and that it had no child labor incidents in 2021.
	and corrective		[2022 Environmental, Social and Governance Report: manager.wisdomir.com]
	actions (in own		• Met: Age verification of recruited workers: The Company indicates that it
	production or		introduces an Identity card verification system combined with manual verification
	manufacturing		at the time of recruitment and entry to ensure that employees meet the minimum
	operations)		working age requirements set by law. [2022 Environmental, Social and Governance
		1	Report: manager.wisdomir.com]
			Score 2
			• Not Met: Remediation if child labour found in operations: The Company states
			that : 'In the event that child labor are recruited by mistake, we will immediately
			stop the work of the employee involved, conduct a health check, and report the
			case to relevant authorities for further investigation. Once child labor is confirmed,
			we will pay the full amount of their salary and send them safely to their family or
			guardian'. However, no information related to the transition from employment to
			education was found. [2022 Environmental, Social and Governance Report:
			manager.wisdomir.com]
D.2.4.b	Prohibition of		The individual elements of the assessment are met or not as follows:
	child labour:	0.5	Score 1
	Age verification		• Met: Requirements on child labour in supplier codes and contracts: The Company
	and corrective		states that it prohibits suppliers from using child labour as defined in local laws and
			that, despite no stipulation of local laws,
	actions (in the		
	supply chain)		

Indicator Code	Indicator name	Score (out of 2)	Explanation
			'suppliers shall not hire any employee under the age of 16 or in compulsory education, and juvenile workers under the age of 18 shall not be exposed to dangerous, unsafe or hazardous working environment'. The Company also indicates that its suppliers shall have sound age verification mechanisms in place as part of the recruitment process and that corrective actions shall be taken immediately in
			case of any employment of child labour found, this includes determining measures in a positive manner to protect the affected child labour, and where appropriate, providing decent work opportunities for their adult family members. [Supplier Handbook, 08/02/2023: <u>ir.anta.com</u> ]
			<ul> <li>Not Met: Describes work with suppliers on eliminating child labour: The Company states measures that should be taken by the suppliers to deal with child labour when finding it, but there is no description of how the own Company plans to help with it. [Supplier Handbook, 08/02/2023: ir.anta.com]</li> <li>Score 2</li> <li>Not Met: Assessment of scope of child labour in supply chain</li> </ul>
			Not Met: Analysis of trends demonstrating progress
D.2.5.a	Prohibition of forced labour: Recruitment fees and costs (in own production or	0	The individual elements of the assessment are met or not as follows: Score 1 • Not Met: Job seekers/workers do not pay recruitment fee • Not Met: Commitment to fully reimburse recruitment fees paid Score 2 • Not Met: Describes implementation and monitoring in own operations, incl. service providers
	manufacturing		
D.2.5.b	operations) Prohibition of forced labour:		The individual elements of the assessment are met or not as follows: Score 1
	Recruitment fees and costs (in the supply chain)	0	<ul> <li>Not Met: Requirements on debt/fees in supplier codes and contracts: The Company states that: 'The factory shall bear the fees to be paid by migrant workers as its business cost and cost of employing the migrant workers', however, no prohibition comprising all workers was found. [Supplier Handbook, 08/02/2023: ir.anta.com]</li> <li>Not Met: Describes work with suppliers on debt/fees for job seekers/workers Score 2</li> </ul>
			<ul> <li>Not Met: Assessment scope of payment of recruitment fees in supply chain</li> <li>Not Met: Analysis of trends demonstrating progress</li> </ul>
D.2.5.c	Prohibition of forced labour: Wage practices (in own production or manufacturing operations)	0	<ul> <li>The individual elements of the assessment are met or not as follows:</li> <li>Score 1</li> <li>Not Met: Pays workers regularly, in full and on time</li> <li>Not Met: Payslip workers shows wages and legitimate deductions</li> <li>Score 2</li> <li>Not Met: Describes implementation and monitoring in own operations, incl. service providers</li> </ul>
D.2.5.d	Prohibition of forced labour: Wage practices (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 • Not Met: Requirements on paying in full and on time in supplier codes and contracts: The Company states that suppliers shall provide payment records that include: 'at least the wage period, date of wage payment, total number of normal working hours, number of overtime hours, total remuneration for normal and overtime work, all other remunerations (e.g. performance bonus and reward), all insurance deductions and/or other legal mandatory deductions'. However, no requirement related to paying directly, in full, and on time was found. [Supplier Handbook, 08/02/2023: <u>ir.anta.com</u> ] • Not Met: Describes work with suppliers on paying workers regularly, in full and on time Score 2 • Not Met: Assessment scope of failure to pay workers in full and on time in supply chain
D.2.5.e	Prohibition of forced labour: Restrictions on workers (in own production or manufacturing operations)	0	<ul> <li>Not Met: Analysis of trends demonstrating progress</li> <li>The individual elements of the assessment are met or not as follows:</li> <li>Score 1</li> <li>Not Met: Does not retain documents or restrict movement of workers</li> <li>Score 2</li> <li>Not Met: Describes implementation and monitoring in own operations, incl. service providers</li> </ul>

Indicator Cod	le Indicator name	Score (out of 2)	Explanation
D.2.5.f	Prohibition of		The individual elements of the assessment are met or not as follows:
	forced labour:		Score 1
	Restrictions on		• Met: Requirements on free movement in supplier codes and contracts: The
	workers (in the		Company states that its suppliers and labour intermediaries engaged by them or
	supply chain)		other third parties shall not detain the originals of employees' personal documents
	supply chain		or hold any personal documents on behalf of any worker, regardless of whether the
			worker has agreed. It also states that suppliers: shall not prohibit or unreasonably
		0.5	restrict employees from using basic facilities such as restrooms and
		0.5	drinking water; shall allow employees to leave the workplace after work: and,
			where dormitories are provided, suppliers shall not unreasonably restrict the
			freedom of movement of employees. [Supplier Handbook, 08/02/2023:
			ir.anta.com]
			• Not Met: Describes working with suppliers on free movement of workers
			Score 2
			Not Met: Assessment of scope of restriction of movement in supply chain
<b>D</b> 2 <i>C</i>			Not Met: Analysis of trends demonstrating progress
D.2.6.a	Freedom of		The individual elements of the assessment are met or not as follows:
	association and		Score 1
	collective		• Not Met: Commits to measures prohibiting interference with trade unions: The
	bargaining (in		Company states that it is committed to protecting the rights of all employees to
	own production		collective agreements and freedom of association, however, no evidence was
	or		found that it puts in place measures to prohibit any form of intimidation,
	manufacturing		harassment, retaliation or violence against the workers seeking to exercise these
	operations)	0	rights. [2022 Environmental, Social and Governance Report:
	operations		<ul> <li>manager.wisdomir.com]</li> <li>Not Met: Discloses % total workforce covered by CB agreements: The Company</li> </ul>
			states that it has over 3,000 employees joining the trade union, however, no data
			regarding the proportion of all workforce covered by collective bargaining
			agreements was found. [2022 Environmental, Social and Governance Report:
			manager.wisdomir.com]
			Score 2
			Not Met: Meets both requirements under score 1
D.2.6.b	Freedom of		The individual elements of the assessment are met or not as follows:
D.2.0.0	association and		Score 1
			• Not Met: Requirements on FoA/CB in suppliers codes and contracts: The
	collective		Company states that its suppliers must respect the legal rights of employees to
	bargaining (in		choose, form, join or refuse to join a labour union or other type of collective
	the supply		organisation, and to participate freely in collective bargaining. It is also stated that:
	chain)		'suppliers shall not hinder workers from legally and peacefully exercising their right
			to freedom of association in any form with threats or violence; no worker shall be
			dismissed, discriminated, harassed, intimidated or retaliated for joining a lawful
			labour union or workers' association, or for exercising their right to freedom of
		0	association in any other form; workers or worker representatives shall be able to
		-	raise issues regarding compliance with a collective bargaining agreement by
			employers without retaliation.' However, it is not clear if the Company requires
			suppliers to respect the workers' right to FoA/CB in all circumstances. No
			information was found on whether the suppliers are required to facilitate FoA/CB
			in regions where unionisation is not supported by laws. [Supplier Handbook,
			08/02/2023: <u>ir.anta.com</u> ]
			Not Met: Describes work with suppliers on FoA/CB
			Score 2
			• Not Met: Assessment of scope of restriction of FoA/CB in supply chain
			Not Met: Analysis of trends demonstrating progress
D.2.7.a	Health and		The individual elements of the assessment are met or not as follows:
	safety:		Score 1
	Fatalities, lost		Not Met: Describes process to identify H&S risks and impacts: The Company
	days, injury,		indicates that: 'In order to build a safe workplace, we strengthen hazard prevention
			and control, monitor the inducing factors of occupational disease, and submit
	occupational		reporting on the occupational hazards in the workplace on an annual basis. We hire
	disease rates		a third party every year to perform occupational health inspection in the
	(in own	0.5	production area and conduct specialized technical inspection on dust, noise and
	production of		other factors. We arrange daily checks and night inspections, organize monthly
	manufacturing		inspections on the fire protection system, and regularly maintain production
	operations)		facilities and the use of equipment by our employees. We have also introduced
			automated technology equipment and put in place a full-fledged, front-loaded
			safety accident prevention system'. However, no information related to its health
		1	and safety impacts was found. [2022 Environmental, Social and Governance
			and safety impacts was found. [2022 Environmental, Social and Governance

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul> <li>Met: Discloses injury rate or lost days for own workers in last reporting period: The Company discloses the number of lost days due to work injury, which was 295.5 for office employees, 1815 for production and logistics staff, and 493 for retail employees. [2022 Environmental, Social and Governance Report: manager.wisdomir.com]</li> <li>Met: Discloses fatalities for own workers in last reporting period: The Company indicates that the number of work-related fatalities was zero. [2022 Environmental, Social and Governance Report: manager.wisdomir.com]</li> <li>Not Met: Discloses occupational disease rate for own workers in last reporting period Score 2</li> <li>Not Met: Sets targets for H&amp;S performance</li> <li>Not Met: Met targets or explains why not or how improve H&amp;S management systems</li> </ul>
D.2.7.b	Health and safety: Fatalities, lost days, injury, occupational disease rates (in the supply chain)	0.5	The individual elements of the assessment are met or not as follows: Score 1 • Met: Requirements on H&S in supplier codes and contracts: The Company states that its suppliers shall provide employees with a working environment and condition that meet occupational health standards and hygiene requirements in accordance with relevant laws to eliminate or reduce occupational hazards and protect the health of employees. It is also indicated that suppliers shall conduct risk assessments of occupational hazards in the workplace, identify and analyse the occupational hazards, and provide treatment measures. Other than that, among other health and safety requirements, it is stated that the occupational health management personnel must possess occupational health knowledge and management ability appropriate and receive occupational health training. [Supplier Handbook, 08/02/2023: ir.anta.com] • Not Met: Discloses injury rate or lost days in supply chain in last reporting period • Not Met: Discloses occupational disease rate in supply chain in last reporting period • Not Met: Discloses work with suppliers of H&S • Not Met: Describes work with suppliers of H&S • Not Met: Assessment of scope of H&S issues in supply chain • Not Met: Assessment of scope of H&S issues in supply chain
D.2.8.a	Women's rights (in own production or manufacturing operations)	0.5	The individual elements of the assessment are met or not as follows: Score 1 • Met: Describes processes to stop harassment and violence against women: The Company states that: 'We do not tolerate any form of discrimination or harassment in the workplace, and have a clear mechanism for punishing and redressing acts of discrimination and harassment in our "Rewards and Discipline Policy". These efforts protect employees against discrimination and harassment, including physical, verbal, sexual or psychological harassment, abuse or threats. We offer employee training programs such as "Healthy Workplace – Say No to Sexual Harassment in the Workplace" to help employees learn about the protections provided by the Company and raise their awareness of self-prevention'. [2022 Environmental, Social and Governance Report: manager.wisdomir.com] • Not Met: Working conditions take into account gender issues • Not Met: Measures and steps to address gender pay gap at all levels of employment Score 2 • Not Met: Meets all requirements under score 1 • Not Met: Analysis of trends demonstrating progress closing gender pay gap
D.2.8.b	Women's rights (in the supply chain)	0.5	The individual elements of the assessment are met or not as follows: Score 1 • Met: Requirements on women's rights in contracts/codes with suppliers: The Company states that suppliers shall comply with all national/regional laws, regulations, and procedures regarding gender-based violence, harassment, and abuse. It is also stated that its suppliers should assess the specific risks of harassment and abuse, including gender-based violence in the workplaces. To address these risks, it shall have a written anti-harassment and abuse policy, which should be communicated to workers through training. [Supplier Handbook, 08/02/2023: <u>ir.anta.com</u> ] • Not Met: Describes work with suppliers on women's rights Score 2 • Not Met: Assessment of scope of unsafe working conditions/discrimination against women in supply chain • Not Met: Analysis of trends demonstrating progress

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.2.9.a	Working hours (in own production or manufacturing operations)	0	The individual elements of the assessment are met or not as follows: Score 1 • Not Met: Respects HRs regarding working hours/breaks/rest • Not Met: Assesses ability of workers to comply with working hours commitments when allocating work Score 2 • Not Met: Describes implementation and monitoring in own operations
D.2.9.b	Working hours (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 • Not Met: Requirements on working hours in codes/contracts with suppliers: The Company states that: 'Suppliers shall not require workers to work beyond the normal and overtime hours stipulated by the laws of the country in which they are employed. Suppliers shall allow workers a minimum of 24 consecutive hours off in every seven-day period'. However, no information related to international standards concerning maximum hours, minimum breaks, and rest periods was found. [Supplier Handbook, 08/02/2023: ir.anta.com] • Not Met: Describes work with suppliers on working hours Score 2 • Not Met: Assesment of scope of excessive working hours in supply chain • Not Met: Analysis of trends demonstrating progress

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
E(1).0	Serious allegation No 1		No allegations meeting the CHRB severity threshold were found, and so the score of 6.66 out of 80 points scored in themes A-D has been applied to produce a score of 1.66 out of 20 points for theme E.

Disclaimer

The terms and conditions as stated in WBA's disclaimer are applicable to this publication. Please consult our disclaimer via worldbenchmarkingalliance.org