

**Corporate Human Rights Benchmark  
2023 Company Scorecard**

**Company name** Capri Holdings  
**Sector** Apparel (supply chain only)  
**Overall score** 10.1 out of 100

Theme score	Out of	For theme
1.4	10	A. Governance and Policy Commitments
4.0	25	B. Embedding Respect and Human Rights Due Diligence
3.5	20	C. Remedies and Grievance Mechanisms
1.2	25	D. Performance: Company Human Rights Practices
0.0	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	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Met: General HRs commitment: The Human Rights Statement indicates: 'we are committed to uphold the fundamental human rights of all those involved in our global operations'. [Human Rights Statement, N/A: <a href="#">s22.q4cdn.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Not Met: Commitment to UNGPs: The Human Rights Statement indicates: 'Our Human Rights Statement is informed by international instruments including, but not limited to, [...] the OECD Guidelines for Multinational Enterprises, [...] and the United Nations Guiding Principles on Business and Human Rights'. Moreover, 'We consider the United Nations Guiding Principles on Business and Human Rights, [...] as best practices for understanding and managing our human rights risks and impacts'. However, neither 'informed by' nor 'consider as best practice' are considered a formal statement of commitment according to CHRB wording criteria. [Human Rights Statement, N/A: <a href="#">s22.q4cdn.com</a>]</li> <li>Not Met: Commitment to OECD MNE Guidelines: See above. [Human Rights Statement, N/A: <a href="#">s22.q4cdn.com</a>]</li> </ul>
A.1.2.a	Commitment to respect the human rights of workers: ILO Declaration on Fundamental	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Not Met: Commitment to ILO core principles: The Human Rights Statement indicates: 'Our Human Rights Statement is informed by international instruments including, but not limited to, [...] the International Labor Organization's Declaration on Fundamental Principles and Rights at Work [...]'. However, 'informed by' is not</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
	Principles and Rights at Work		<p>considered a formal statement of commitment according to CHRB wording criteria. [Human Rights Statement, N/A: <a href="https://s22.q4cdn.com">s22.q4cdn.com</a>]</p> <ul style="list-style-type: none"> <li>• Not Met: Explicitly lists all four ILO core principles: The Human Rights Statement mentions each ILO Core commitment when indicating what it expects from suppliers. However, no policy statement found including explicit commitments to respect freedom of association and the right to collective bargaining and the rights not to be subject to forced labour, child labour or discrimination in respect of employment and occupation. [Human Rights Statement, N/A: <a href="https://s22.q4cdn.com">s22.q4cdn.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Expects suppliers to commit to ILO core principles: The Code of Conduct for Business Partners indicates: 'The Code is informed by the United Nation's Universal Declaration of Human Rights and is based on the Core Conventions of the International Labour Organization (ILO)'. However, to have the Code 'informed by' is not considered a formal statement of commitment according to CHRB wording criteria. [Code of Conduct for Business Partners, 01/04/2023: <a href="https://s22.q4cdn.com">s22.q4cdn.com</a>]</li> <li>• Not Met: Explicitly lists all four ILO core principles for suppliers: The Code of Conduct for Business Partners has explicit requirements regarding each ILO core area: discrimination, forced labour, child labour, freedom of association and collective bargaining. As for freedom of association and collective bargaining, it states: 'Our business partners are required to recognize and respect the right of freedom of association and collective bargaining, and must respect the legal rights of workers to freely and without harassment form, belong to, and participate, or not participate in, worker organizations of their choice. The Company encourages business partners to engage with local and global unions to improve freedom of association and to promote alternative forms of organizing'. However, it is not clear whether the Company requires to respect those rights in all contexts, as it indicates 'respect the legal rights', considering that in some countries those rights are not granted. In these cases (Companies referring to local laws in freedom of association and collective bargaining), Companies are expected to require alternative mechanisms or equivalent workers bodies where the right to freedom of association and collective bargaining is restricted under law. In this case, the Company seems to 'encourage' business partners, not necessarily requiring. [Code of Conduct for Business Partners, 01/04/2023: <a href="https://s22.q4cdn.com">s22.q4cdn.com</a>]</li> </ul>
A.1.2.b	Commitment to respect the human rights of workers: Health and safety and working hours	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Commitment to respect H&amp;S of workers: The Code of Business Conduct and Ethics indicates: 'The Company is committed to providing a safe, healthy and comfortable workplace for all employees. The Company will not knowingly permit unsafe conditions to exist, nor will it permit employees to engage in unsafe acts'. [Code of Business Conduct and Ethics, 09/01/2021: <a href="https://s22.q4cdn.com">s22.q4cdn.com</a>]</li> <li>• Not Met: Commitment to ILO working hours standards or 48 hour regular work week: The Human Rights Statement mentions working hours when indicating what it expects from suppliers. However, no evidence found of the Company explicitly committing to respect ILO conventions on working hours or that publicly states that workers are not required to work more than 48 hours as regular working week, and that overtime is consensual and paid at a premium rate. [Human Rights Statement, N/A: <a href="https://s22.q4cdn.com">s22.q4cdn.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Expects suppliers to commit to H&amp;S of workers: The Code of Conduct for Business Partners indicates: 'Our business partners must ensure that their workers are provided a safe and healthy work environment, and dormitories and canteens as applicable, and must ensure workers are not subject to unsanitary or hazardous conditions'. [Code of Conduct for Business Partners, 01/04/2023: <a href="https://s22.q4cdn.com">s22.q4cdn.com</a>]</li> <li>• Met: Expects suppliers to commit to ILO working hours standards or 48 hour regular work week: The Code of Conduct for Business Partners indicates: 'Our business partners must comply with all local laws and regulations applicable with respect to working hours, which shall not in any case exceed the maximum set by internationally recognized standards including those of the International Labour Organization'. [Code of Conduct for Business Partners, 01/04/2023: <a href="https://s22.q4cdn.com">s22.q4cdn.com</a>]</li> </ul>
A.1.3.AP	Commitment to respect human rights particularly relevant to the sector –	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Commitment to women's rights: The Human Rights Statement indicates: 'Our Company is a signatory to the UN Women's Empowerment Principles'. A commitment to the Women's Empowerment Principles (WEP) is a proxy for 'respecting women's rights, according to CHRB standards. [Human Rights Statement, N/A: <a href="https://s22.q4cdn.com">s22.q4cdn.com</a>]</li> <li>• Not Met: Expects suppliers to respect these rights</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
	vulnerable groups (AP)		Score 2 <ul style="list-style-type: none"> <li>Met: Commitment refers to CEDAW/Women's Empowerment Principles: The Human Rights Statement indicates: 'Our Company is a signatory to the UN Women's Empowerment Principles'. [Human Rights Statement, N/A: <a href="https://s22.q4cdn.com">s22.q4cdn.com</a>]</li> <li>Not Met: Expects suppliers to respect these rights</li> </ul>
A.1.4	Commitment to remedy	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Not Met: Commitment to remedy adverse HRs impacts: The Human Rights Statement indicates: 'We are committed to remaining vigilant in identifying the adverse human rights impacts of our activities in order to prevent, mitigate and/or remedy any such negative impacts'. However, although the Company commits to 'remaining vigilant', no publicly available statement found of a commitment to remedy the adverse impacts on individuals and workers and communities that it has caused or contributed to. [Human Rights Statement, N/A: <a href="https://s22.q4cdn.com">s22.q4cdn.com</a>]</li> <li>Not Met: Expects suppliers to make this commitment</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Not Met: Commitment to collaborate with judicial or non-judicial mechanisms</li> <li>Not Met: Commitment to work with suppliers on remedy: The Human Rights Statement indicates: 'We are dedicated to supporting our suppliers' continuous improvement and work closely with suppliers to support their improvement during the CAP [corrective action plans] process'. However, no commitment to work with suppliers to remedy adverse impacts which are directly linked to the Company's operations, products or services, beyond CAPs found. [Human Rights Statement, N/A: <a href="https://s22.q4cdn.com">s22.q4cdn.com</a>]</li> </ul>
A.1.5	Commitment to respect the rights of human rights defenders	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Not Met: Zero tolerance of threats/attacks on HRDs</li> <li>Not Met: Expects suppliers to make this commitment</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Not Met: Commitment to working with HRDs to create safe and enabling environment</li> </ul>

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.2.1	Commitment from the top	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Met: Board level responsibility for HRs: The Company states that its CSR program is oversight by the Board's Governance, nominating and Corporate Social Responsibility Committee (Governance Committee). 'On at least an annual basis, our sustainability goals and action plans are presented to the Governance Committee for review and approval, along with CSR progress updates which are presented quarterly. The full Board of Directors regularly receives ESG updates from the Governance Committee and reviews our annual CSR reporting. The Board's Audit Committee also assesses ESG risks as a part of its overall enterprise risk management review, and the Board's Compensation and Talent Committee considers performance against individualized ESG goals in making executive compensation decisions.' The Company also indicates that human rights were identified as the most relevant ESG topic to Capri Holdings during 2022 materiality assessment. It is assumed therefore that its Board level Governance Committee's oversight on ESG issues covers human rights. [2022 Annual Update Corporate Social Responsibility, 2022: <a href="https://s22.q4cdn.com">s22.q4cdn.com</a>]</li> <li>Not Met: Describes HRs expertise of Board member: The Company states that its 'believe that our Board's diverse skills, qualifications and experience are particularly valuable to the effective oversight of our company and the execution of our strategy.' The skills on its Board include Corporate Social Responsibility and HR/Talent management. However, no evidence found human rights expertise of the board members tasked with governance oversight over human rights. [2022 Annual Update Corporate Social Responsibility, 2022: <a href="https://s22.q4cdn.com">s22.q4cdn.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Not Met: Board member/CEO signal importance of HRs in their communications</li> </ul>
A.2.2	Board responsibility	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Not Met: Process to review HRs strategy at board level</li> <li>Not Met: Example of HRs issues/trends discussed in last reporting period</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Not Met: Meets both requirements under score 1</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Not Met: Describes how affected stakeholders / HRs experts inform board discussions</li> </ul>
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"> <li>• Not Met: At least one board member incentive linked to HRs commitments: The Company states that 'Beginning in our Fiscal Year 2023, 10% of our leadership's annual incentive compensation will be tied to individualized ESG goals.' The leadership refers to Governance Committee, CSR Executive Committee, Sustainability Steering Committee, and Global CSR Team. However, no evidence found specific incentive or performance management scheme linked to human rights policy for board members. [2022 Annual Update Corporate Social Responsibility, 2022: <a href="https://s22.q4cdn.com">s22.q4cdn.com</a>]</li> <li>• Not Met: Incentive scheme linked to key HRs risks beyond employee H&amp;S</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Performance criteria linked to HRs made public</li> <li>• Not Met: Review of other board incentives for coherence with HRs policies</li> </ul>
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"> <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> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <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 and resources for day-to-day human rights functions	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Score of 1 on A.1.2.a</li> <li>• Met: Senior responsibility for HRs implementation and decision making: The Company states that its sustainability governance model includes a multi-level structure to ensure Board of Directors, executive management team and business leaders across our brands are aligned on the most important ESG risks and opportunities for Capri. As the Company says human rights were identified as the most relevant ESG topic to Capri Holdings during 2022 materiality assessment. It is assumed that its sustainability governance model includes responsibility for human rights issues. The model includes that the 'Governance, Nominating and Corporate Social Responsibility Committee provides Board-level oversight of CSR strategy, long-term sustainability goals and reporting. Our CSR Executive Committee is made up of executive-level brand and company leadership, providing direction and support for all pillars and focus areas within our CSR strategy'. [2022 Annual Update Corporate Social Responsibility, 2022: <a href="https://s22.q4cdn.com">s22.q4cdn.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Describes day-to-day responsibility for implementing HRs commitments: Following explanation above, the Company indicates also that 'Our Sustainability Steering Committee includes leaders across key business functions who are responsible for driving progress toward Capri's environmental sustainability goals. Our Global CSR Team, led by Capri's Chief Sustainability Officer, manages the strategy and reporting of our global CSR progress, while closely coordinating with business partners to drive implementation of sustainability initiatives throughout our organization.' [2022 Annual Update Corporate Social Responsibility, 2022: <a href="https://s22.q4cdn.com">s22.q4cdn.com</a>]</li> <li>• Not Met: Day-to-day resources and expertise allocation in own operations</li> <li>• Met: Resources and expertise allocation in supply chain: The Company states that 'We identify human rights risks through our factory compliance program, participation in multi-stakeholder initiatives, and regular materiality assessments. Our factory compliance program was developed by a cross functional team of Company executives, including our Senior Vice President, General Counsel and Chief Sustainability Officer; Senior Vice President, Chief Supply Chain Officer; and executives within our internal audit, risk management and production departments. Day to day execution of the factory compliance program is the responsibility of our factory compliance team, overseen by our Senior Vice President, General Counsel and Chief Sustainability Officer.' [Human Rights Statement, N/A: <a href="https://s22.q4cdn.com">s22.q4cdn.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.2	Incentives and performance management	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Senior manager incentives linked to HRs commitments</li> <li>• Not Met: Incentive scheme linked to key HRs risks beyond employee H&amp;S</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Performance criteria linked to HRs made public</li> <li>• Not Met: Review of other senior management incentives for coherence with HRs policies</li> </ul>
B.1.3	Integration with enterprise risk management	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: HRs risks integrated as part of enterprise risk system: The Company states that 'Enterprise risk management (ERM) is an integral part of our business processes. Our ERM process aims to identify, measure, monitor and manage enterprise-wide risks facing Capri, including our top ESG risks. The Board regularly reviews Capri's major strategic, operational, financial, legal, regulatory and reputational risks as well as risks relating to cybersecurity and global information systems and those related to ESG matters, along with potential options for mitigating these risks.' However, no explicit evidence found that human rights risk management is integrated into its enterprise risk management. [2022 Annual Update Corporate Social Responsibility, 2022: <a href="https://s22.q4cdn.com">s22.q4cdn.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Provides an example</li> <li>• Not Met: Risk assesment by Audit Committee or independent third party</li> </ul>
B.1.4.a	Communication /dissemination of policy commitment(s) to workers and external stakeholders	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Score of 1 on A.1.2.a</li> <li>• Not Met: Communicates HRs policies to all workers in own operations</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Communicates HRs policies to stakeholders</li> <li>• Not Met: Example of how HRs policies are accessible for intended audience</li> </ul>
B.1.4.b	Communication /dissemination of policy commitment(s) to business relationships	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Meets ILO requirement for suppliers on A.1.2.a</li> <li>• Met: Requires suppliers to communicate HRs policies: The Company states that 'Our direct supply chain partners must post the Suppler Code in all of their facilities in which products for any of our brands are produced, in a prominent manner and in the language(s) understood by workers at each facility'. It also indicates that 'Our suppliers are responsible for ensuring their factories, workers, subcontractors and business partners involved in the production of products (or components thereof) for any of our brands comply with our Supplier Code. Our goal is to only work with suppliers that are honest, transparent and committed to ethical business practices'. [Human Rights Statement, N/A: <a href="https://s22.q4cdn.com">s22.q4cdn.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Describes how HRs policies are contractual/binding for suppliers</li> <li>• Not Met: Requires suppliers to cascade contractual/binding HRs policies to its suppliers</li> </ul>
B.1.5	Training on Human Rights	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Score of at least 1 on A.1.2.a</li> <li>• Not Met: Describes how workers are trained on HRs policy commitments</li> <li>• Not Met: Trains relevant managers including procurement on HRs</li> </ul> Score 2 <ul style="list-style-type: none"> <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 states that 'We use the mechanisms described above, as well as our human rights-focused trainings, to deepen our Company's ability to recognize the salient human rights issues and risks within our supply chain.' However, no further details found on the training. [Human Rights Statement, N/A: <a href="https://s22.q4cdn.com">s22.q4cdn.com</a>]</li> <li>• Not Met: Discloses % suppliers trained</li> </ul>
B.1.6	Monitoring and corrective actions	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Score of at least 1 on A.1.2.a</li> <li>• Not Met: Monitors implementation of HRs policy commitments across global ops and supply chain: The Company states that 'Our regular audit protocol calls for on-site audits of certain suppliers to be conducted each year based on our risk assessment findings and/or the results of prior audits. We also generally conduct</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>announced on-site audits of direct suppliers at least every three years and unannounced audits as the circumstances warrant. As part of our regular audit protocol, an independent third-party auditor evaluates, among other things, a manufacturing contractor's compliance with our Supplier Code and applicable laws. During on-site audits, the independent third-party auditor will visit and inspect the facility, conduct interviews with supervisors, managers and workers (including without supervisors or managers present), and review relevant books and records of the third-party manufacturer.' The Company also reports that 'During Fiscal Year 2022, we engaged independent third-party auditors to conduct announced and unannounced audits and site inspections focused on working hours; wages and compensation; child, forced and prison labor; disciplinary practices; discrimination; health and safety; and worker welfare.' However, no evidence found on the monitoring implementation for its own operations. [Human Rights Statement, N/A: <a href="https://s22.q4cdn.com">s22.q4cdn.com</a>] &amp; [2022 Annual Update Corporate Social Responsibility, 2022: <a href="https://s22.q4cdn.com">s22.q4cdn.com</a>]</p> <ul style="list-style-type: none"> <li>• Not Met: Discloses % of supply chain monitored: The Company reports that 'During our Fiscal Year 2022, we conducted audits at 74 of our Tier 1 suppliers and at 66 of our Tier 2 suppliers through independent, third-party auditors. The Tier 1 suppliers subject to these audits represent approximately 60% of our total fiscal year production spend with Tier 1 suppliers. In addition to our own audit program, we continued to leverage SAC tools including SAC's FSLM. We accepted FSLM responses from 40 direct suppliers during 2022, with 35% of those FSLM responses being verified'. It is not clear, however, the actual percentage of the supply chain or spending that was monitored, since it's not clear what percentage of tier 2 suppliers that 66 suppliers represent. [2022 Annual Update Corporate Social Responsibility, 2022: <a href="https://s22.q4cdn.com">s22.q4cdn.com</a>]</li> <li>• Not Met: Describes how workers are involved in monitoring</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Score of 2 on A.1.2.a</li> <li>• Not Met: Describes corrective actions process</li> <li>• Not Met: Discloses findings and number of correction action processes: The Company reports that 'The most common issues identified during our Fiscal Year 2022 audits and assessments fell within the following categories of non-compliance: health and safety, wages and benefits, and working hours. Over 70% of the corrective action plans issued in connection with our 2022 audits have been completed in full as of the date of this report'. It is not clear however, the actual number of corrective action processes that were implemented. [2022 Annual Update Corporate Social Responsibility, 2022: <a href="https://s22.q4cdn.com">s22.q4cdn.com</a>]</li> </ul>
B.1.7	Engaging and terminating 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"> <li>• Not Met: HRs performance affects selection suppliers: The Company states that 'All new suppliers must meet our program standards including certification of their compliance with our Supplier Code.' However, no further details found how human rights policy influences the identification and selection of business relationships. [2022 Annual Update Corporate Social Responsibility, 2022: <a href="https://s22.q4cdn.com">s22.q4cdn.com</a>]</li> <li>• Met: HRs performance affects continuation supplier relationships: The Company states that 'We strive to swiftly address instances of non-compliance by working closely with our suppliers and third-party audit partners to pursue time-bound corrective actions. We support remediation where possible, but we reserve the right to terminate our relationship with partners who do not address compliance issues or who are found to have committed zero tolerance violations.' [2022 Annual Update Corporate Social Responsibility, 2022: <a href="https://s22.q4cdn.com">s22.q4cdn.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Describes positive HRs incentives for business relationships</li> <li>• Not Met: Works with suppliers to meet HRs requirements</li> </ul>
B.1.8	Approach to engagement with affected stakeholders	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Describes how workers and communities identified and engaged in the last two years</li> <li>• Not Met: Discloses stakeholders whose HRs may be affected</li> <li>• Not Met: Provides two examples of engagement with stakeholders</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Analysis of stakeholder views on company's HRs issues</li> <li>• Not Met: Describes how stakeholders views influenced company's HRs approach</li> </ul>

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.1	Identifying human rights risks and impacts	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Describes process of identifying risks in own operations</li> <li>• Met: Describes process for identifying risks in business relationships: The Company states that 'Our factory compliance program includes a risk assessment process designed to screen suppliers against comprehensive human rights risks indicators in order to identify potential adverse human rights risks at the supplier level.' The Company also indicates that 'we also leverage inherent risk intelligence from a cloud-based global supply chain risk intelligence software system to inform our ongoing global human rights risk identification program. Our factory compliance team combines this intelligence with information learned through our supplier-level risk assessments and audits to provide a comprehensive view of our human rights impacts across our global supply chain, and allows us to work to remediate possible risks before they happen'. [Human Rights Statement, N/A: <a href="https://s22.q4cdn.com">s22.q4cdn.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Describes global risk identification system incl. stakeholder consultation</li> <li>• Not Met: Describes how risk identification system is triggered by new circumstances</li> <li>• Not Met: Describes risks identified in relation to new circumstances</li> </ul>
B.2.2	Assessing human rights risks and impacts	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Describes assessment process and discloses salient HRs risks</li> <li>• Met: Describes how process applies to supply chain: The Company states that 'Our factory compliance program includes a risk assessment process designed to screen suppliers against comprehensive human rights risks indicators in order to identify potential adverse human rights risks at the supplier level.' The Company also indicates that 'we also leverage inherent risk intelligence from a cloud-based global supply chain risk intelligence software system to inform our ongoing global human rights risk identification program. Our factory compliance team combines this intelligence with information learned through our supplier-level risk assessments and audits to provide a comprehensive view of our human rights impacts across our global supply chain' In addition, 'When assessing the human rights risks at a manufacturing facility, we consider that facility's geographic location and the nature of its manufacturing activities for us, including the facility's anticipated production volume. As part of our typical risk assessment process, we conduct preliminary due diligence of each potential direct supplier facility and require related questionnaires addressing human rights, local regulatory compliance and workers' rights concerns, amongst other topics, to be completed by these potential suppliers.' [Human Rights Statement, N/A: <a href="https://s22.q4cdn.com">s22.q4cdn.com</a>]</li> <li>• Met: Public disclosure of results of HRs risk assessment: The Company reports that 'We have identified the salient human rights risks within our supply chain and organized them into the following general areas of focus: elimination of forced or compulsory labor; abolition of child labor; elimination of discrimination in respect of employment and occupation; benefits and working hours; and fair wages. Our most salient human rights risks impacting the workers in our supply chain are wages and working hours.' [Human Rights Statement, N/A: <a href="https://s22.q4cdn.com">s22.q4cdn.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Meets all requirements under score 1</li> <li>• Not Met: Describes how assessment involved affected stakeholders</li> </ul>
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"> <li>• Not Met: Describes system to prevent, mitigate and remediate HRs issues</li> <li>• Not Met: Describes how global system applies to supply chain: The Company states that 'Our factory compliance team reviews the results of our due diligence assessments and/or audits to evaluate the risk level of the supplier and the supplier is assigned a rating. Business may only be commenced or continued with suppliers attaining appropriate ratings. A supplier's rating also informs our remediation actions for compliance issues and cadence for subsequent assessments. If appropriate following an assessment or audit, corrective action plans ("CAPs") may be developed for a supplier, indicating all concerns raised by the audit/assessment, proposing a solution to each concern and setting the date by which each concern will be addressed. Priority is given to address the most serious issues identified in a CAP first.' However, this indicator looks for evidence of how the Company takes proactive action plans to prevent, mitigate or remediate what it considers to be its</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>salient issues rather than conducting individual corrective action plans once a non-compliance is found. [Human Rights Statement, N/A: <a href="#">s22.q4cdn.com</a>]</p> <ul style="list-style-type: none"> <li>• Not Met: Example of actions decided on at least 1 salient HRs issue</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Meets all requirements under score 1</li> <li>• Not Met: Describes how stakeholders involved in decisions about actions taken</li> </ul>
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:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Describes system for evaluation effectiveness of actions</li> <li>• Not Met: Example of lessons learned from evaluation effectiveness of actions</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Meets all requirements under score 1</li> <li>• Not Met: Involves stakeholders in evaluation effectiveness of actions</li> </ul>
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"> <li>• Not Met: Provides two examples of comms with stakeholders</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Describes challenges to effective comms and how it is working to address them</li> </ul>

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.1	Grievance mechanism(s) for 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"> <li>• Met: Grievance mechanism accessible to all workers: The Company states that it has 'a global hotline that serves as a grievance mechanism for our own employees, for workers in our supply chain, and for other Company stakeholders to confidentially or, subject to certain legal limitations, discreetly report workplace concerns, including those related to suspected violations of our Supplier Code'. [Human Rights Statement, N/A: <a href="#">s22.q4cdn.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Grievance mechanism available in appropriate languages and workers made aware: The Company states that local phone numbers and support in local languages are provided through its grievance mechanisms. However, no evidence found that how employees are made aware of the mechanism and language options. [Human Rights Statement, N/A: <a href="#">s22.q4cdn.com</a>]</li> <li>• Met: Describes how workers in supply chain access grievance mechanism: The Company states that 'we require all of our brands' direct supply chain partners to post an informational poster related to the aforementioned hotline (translated into the relevant languages understood by workers at its facilities) in common spaces accessible to its workers, and to distribute posters to all offsite workers engaged in the production or sourcing of products (or components thereof). Through this hotline, business partners, workers and other Company stakeholders, including members of the general public, may report their concerns confidentially and, if desired, anonymously. We also encourage our supply chain partners to develop and implement their own grievance mechanisms for employees'. [Human Rights Statement, N/A: <a href="#">s22.q4cdn.com</a>]</li> <li>• Not Met: Expects suppliers to convey expectation to their suppliers</li> </ul>
C.2	Grievance mechanism(s) for 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"> <li>• Met: Grievance mechanism accessible to all external individuals and communities: The Company discloses that the global hotline is also available for other company stakeholders, including members of the general public. [Human Rights Statement, N/A: <a href="#">s22.q4cdn.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Grievance mechanism available in appropriate languages and affected stakeholders made aware</li> <li>• Met: Describes how external individuals/communities access grievance mechanism</li> <li>• 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	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Describes how users engaged on design and performance</li> <li>• Not Met: Provides user engagement examples (at least two) on design and performance</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Describes how users engaged on improvement of mechanism</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Not Met: Provides user engagement examples (at least two) on improvement</li> </ul>
C.4	Procedures related to the mechanism(s) are equitable, publicly available and explained	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Describes procedure and timescales for managing complaints or concerns</li> <li>• Not Met: Describes technical, financial, advisory support to enable equal access</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Describe types of outcome to complainant through use of mechanism</li> <li>• Not Met: Describes escalation to senior levels / independent adjudicators</li> </ul>
C.5	Prohibition of retaliation for raising complaints or concerns	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Public statement prohibiting retaliation against workers/stakeholders: The Company states that 'We prohibit retaliation against any person raising a complaint or concern in good faith via our grievance mechanisms, and against any stakeholders that may raise human rights-related concerns via other channels.'</li> </ul> <p>[Human Rights Statement, N/A: <a href="https://www.s22.q4cdn.com">s22.q4cdn.com</a>]</p> <ul style="list-style-type: none"> <li>• Not Met: Describes practical measures to prevent retaliation</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Specifies no legal action, firing or violence</li> <li>• Not Met: Expects suppliers to prohibit retaliation against workers/stakeholders</li> </ul>
C.6	Company involvement with state-based judicial and non-judicial grievance mechanisms	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Complainants not asked to waive legal rights</li> <li>• Not Met: Does not require confidentiality provisions</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <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	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Describes approach taken to remedy adverse HRs impacts</li> <li>• Not Met: Describes how remedy would be provided if no adverse impact identified</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Describes changes to systems, processes and practices to prevent future impacts</li> <li>• Not Met: Describes approach to monitoring/implementing agreed remedy</li> <li>• Not Met: Describes approach to learning from incidents if no adverse impacts identified</li> </ul>
C.8	Communication on the effectiveness of grievance mechanism(s) and incorporating lessons learned	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Discloses number of grievances filed, addressed or resolved and outcomes achieved</li> <li>• Not Met: Example of how lessons from mechanism improved HRs management system</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Describes process to evaluate mechanism and changes made as a result</li> <li>• Not Met: Describes procedures to address delays of outcomes agreed with stakeholders</li> </ul>

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.2.1.b	Living wage (in the supply chain)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Requirements on living wage in supplier codes and contracts: The Company states that 'Our business partners must comply with all laws regulating local wages and benefits. Wage and benefit policies must be consistent with prevailing national standards and must also be acceptable under a broader international understanding as to the basic needs of workers and their families. Our business partners are encouraged to provide wages and benefits that are sufficient to cover workers' basic needs and some discretionary income'. However, no evidence found of an explicit requirement for suppliers to pay a living wage. The Company 'encourages' paying to cover basic of workers plus some discretionary income. However, it is expected to require either paying a living wage (which includes workers basic needs plus some discretionary income and family/depends) or requiring a bound target to do so. [Code of Conduct for Business Partners, 01/04/2023: <a href="https://www.s22.q4cdn.com">s22.q4cdn.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Not Met: Describes work with suppliers on living wage</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Assessment of scope of payment below living wage in supply chain</li> <li>• Not Met: Analysis of trends demonstrating progress</li> </ul>
D.2.2	Aligning purchasing decisions with human rights	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Describes practices to avoid price or short notice requirements that undermine HRs</li> <li>• Not Met: Describes practices to pay suppliers in line with agreed timeframes</li> <li>• Not Met: Reviews own operations to mitigate negative impact of purchasing practices</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Meets all requirements under score 1</li> <li>• Not Met: Example of assessing and changing of purchasing practices</li> </ul>
D.2.3	Mapping and disclosing the supply chain	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Identifies direct and indirect suppliers including manufacturing sites: The Company indicates that ‘We recognize that having reliable data on each step of our products’ life cycles would improve the quality of our supplier and geographic risk data and provide for more comprehensive and informed human rights risk assessments. We have therefore committed to achieving 95% traceability of our fabric, trim and hardware suppliers and processing units by 2025, and 95% of our raw material suppliers by 2030. Fashion.’ However, currently supply chain mapping is not available yet. it is not clear how it goes about it. [Human Rights Statement, N/A: <a href="https://s22.q4cdn.com">s22.q4cdn.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Discloses names and locations of significant parts of supply chain and how significance was defined</li> <li>• Not Met: Discloses direct or indirect suppliers involved in higher-risk activities</li> </ul>
D.2.4.b	Prohibition of child labour: Age verification and corrective actions (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Requirements on child labour in supplier codes and contracts: The Company states that ‘Our business partners must not use child labor, defined as school-age children. Our business partners will not employ workers under the age of 15 or under the legal minimum age for employment in the applicable country, whichever is greatest. This provision extends to all partner facilities. In addition, workers under the age of 18 should not be exposed to hazardous working conditions.’ However, no evidence found requirements on verifying the age of workers recruited and remediation programs for child labour. [Code of Conduct for Business Partners, 01/04/2023: <a href="https://s22.q4cdn.com">s22.q4cdn.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Describes work with suppliers on eliminating child labour</li> <li>• Not Met: Assessment of scope of child labour in supply chain</li> <li>• Not Met: Analysis of trends demonstrating progress</li> </ul>
D.2.5.b	Prohibition of forced labour: Recruitment fees and costs (in the supply chain)	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Met: Requirements on debt/fees in supplier codes and contracts: The Company reports that ‘Our business partners must ensure that no fees or costs have been charged, directly or indirectly, in whole or in part, to job-seekers and workers for their services directly related to recruitment for temporary or permanent job placement, including when using the services of private recruitment, labor broker or employment agent or performing recruitment activities directly. Workers shall not be required to pay employers’ or their agents’ recruitment fees or other similar fees to obtain their employment. Our business partners shall also ensure that the third-party recruitment agencies (including labor brokers) it uses are compliant with the provisions of this Code and applicable law, and shall provide us with a list of the recruitment agencies they are using and the amount of fees being paid to such agencies.’ [Code of Conduct for Business Partners, 01/04/2023: <a href="https://s22.q4cdn.com">s22.q4cdn.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Describes work with suppliers on debt/fees for job seekers/workers</li> <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.d	Prohibition of forced labour: Wage practices (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Requirements on paying in full and on time in supplier codes and contracts</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Not Met: Describes work with suppliers on paying workers regularly, in full and on time</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Assessment scope of failure to pay workers in full and on time in supply chain</li> <li>• Not Met: Analysis of trends demonstrating progress</li> </ul>
D.2.5.f	Prohibition of forced labour: Restrictions on workers (in the supply chain)	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Met: Requirements on free movement in supplier codes and contracts: The Company states that 'Our business partners shall not retain any documents or demand monetary deposits or other collateral as a condition of employment. Workers must not be subject to the withholding of wages, original identification cards, original passports or other original travel documents or personal belongings'. [Code of Conduct for Business Partners, 01/04/2023: <a href="https://s22.q4cdn.com">s22.q4cdn.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Describes working with suppliers on free movement of workers</li> <li>• Not Met: Assessment of scope of restriction of movement in supply chain</li> <li>• Not Met: Analysis of trends demonstrating progress</li> </ul>
D.2.6.b	Freedom of association and collective bargaining (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Requirements on FoA/CB in suppliers codes and contracts: The Company states that 'Our business partners are required to recognize and respect the right of their workers to freedom of association and collective bargaining. Our business partners should respect the legal rights of workers to freely and without harassment participate in worker organizations of their choice.' However, no evidence found that the Company has a policy for its supply chain to prohibit retaliation, intimidation and violence against trade union members and representatives. [Code of Conduct for Business Partners, 01/04/2023: <a href="https://s22.q4cdn.com">s22.q4cdn.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Describes work with suppliers on FoA/CB</li> <li>• Not Met: Assessment of scope of restriction of FoA/CB in supply chain</li> <li>• Not Met: Analysis of trends demonstrating progress</li> </ul>
D.2.7.b	Health and safety: Fatalities, lost days, injury, occupational disease rates (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Requirements on H&amp;S in supplier codes and contracts: The Company states that 'Our business partners must ensure that their workers are provided a safe and healthy work environment, and are not subject to unsanitary or hazardous conditions'. However, no further details found including actual health and safety requirements. [Code of Conduct for Business Partners, 01/04/2023: <a href="https://s22.q4cdn.com">s22.q4cdn.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Discloses injury rate or lost days in supply chain in last reporting period</li> <li>• Not Met: Discloses fatalities for workers in supply chain in last reporting period</li> <li>• Not Met: Discloses occupational disease rate in supply chain in last reporting period</li> <li>• Not Met: Describes work with suppliers of H&amp;S</li> <li>• Not Met: Assessment of scope of H&amp;S issues in supply chain</li> <li>• Not Met: Analysis of trends demonstrating progress</li> </ul>
D.2.8.b	Women's rights (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Requirements on women's rights in contracts/codes with suppliers</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Describes work with suppliers on women's rights</li> <li>• Not Met: Assessment of scope of unsafe working conditions/discrimination against women in supply chain</li> <li>• Not Met: Analysis of trends demonstrating progress</li> </ul>
D.2.9.b	Working hours (in the supply chain)	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Met: Requirements on working hours in codes/contracts with suppliers: The Company reports that Our business partners must comply with all local laws and regulations applicable with respect to working hours, which shall not in any case exceed the maximum set by internationally recognized standards such as the International Labour Organization. Our business partners may not impose excessive overtime hours. The total number of hours worked per week including overtime may not exceed legal limits, and workers are entitled to the minimum number of days off established by applicable laws'. [Code of Conduct for Business Partners, 01/04/2023: <a href="https://s22.q4cdn.com">s22.q4cdn.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Not Met: Describes work with suppliers on working hours</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Assessment of scope of excessive working hours in supply chain</li> <li>• Not Met: Analysis of trends demonstrating progress</li> </ul>

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
E(1).0	Serious allegation No 1		<ul style="list-style-type: none"> <li>• Area: Freedom of Association &amp; Collective Bargaining</li> <li>• Headline: Michael Kors' supplier Superl accused of taking advantage of the pandemic and firing union workers in Cambodia</li> <li>• Story: On March 31, 2020, several dozen union workers at the Superl leatherwear factory on the outskirts of Phnom Penh, Cambodia, which produces handbags for brands like Kate Spade (owner Tapestry), Michael Kors (owner Capri Holdings), and Tory Burch, were told they were dismissed.</li> </ul> <p>Soy Sros, a factory shop steward and the local president of the Collective Union of Movement of Workers, wrote about the Company's actions on Facebook, stating it violated a March 6 appeal from the Cambodian government saying Covid should not be used as a chance to discriminate against union members.</p> <p>Twenty-four hours later, Ms. Sros was forced by factory management to take down her post and make a thumbprint on a warning letter accusing her of defamation. Later on, she was removed from the factory floor by the police and charged with posting fake information on social media. In particular, at the police station Sros, a single mother of two young children, discovered the Company had filed criminal charges, claiming that she had incited social unrest, defamed the factory and spread "fake news". The Cambodian courts charged her with an additional two criminal charges for provocation, charges that carry prison terms of up to three years.</p> <p>[Business &amp; Human Rights Resource Centre, 01/06/2020, "Cambodia: Unions urge factory producing for intl. apparel brands to withdraw charges against jailed union leader released on bail; Incl. company responses": <a href="https://www.business-humanrights.org">business-humanrights.org</a>] [The Guardian, 16/06/2020, "Jailed for a Facebook post: garment workers' rights at risk during Covid-19": <a href="https://www.theguardian.com">theguardian.com</a>]</p>
E(1).1	The company has responded publicly to the allegation	0	<p>The individual elements of the assessment are met or not as follows:</p> Score 1 <ul style="list-style-type: none"> <li>• Not Met: Public response: In response to the allegation, Superl stated: "Superl will go to the police on Monday June 1, 2020 to understand the situation, communicate with the police, they will do their best to help Mrs. Soy Sros. During the period of Mrs. Soy Sros was in the jail, they will pay as normal workers in the factory. Another meeting will be arranged between Cumw plus Mrs. Soy Sros and Superl to make an agreement without retaliation, discrimination to each other. The both will forget the past and closely work together for improving working conditions for workers in the factory." However, no evidence was found that the Capri Holdings responded publicly to the allegation or pointed to the response by Superl. [Business &amp; Human Rights Resource Centre, 01/06/2020: <a href="https://www.business-humanrights.org">business-humanrights.org</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Detailed response</li> </ul>
E(1).2	The company has investigated and taken appropriate action	0	<p>The individual elements of the assessment are met or not as follows:</p> Score 1 <ul style="list-style-type: none"> <li>• Not Met: Engaged with stakeholders</li> <li>• Not Met: Identified cause</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Identified and implemented improvements</li> <li>• Not Met: Stakeholder input to steps taken</li> </ul>
E(1).3	The company has engaged with affected stakeholders to provide for or cooperate in remedy(ies)	0	<p>The individual elements of the assessment are met or not as follows:</p> Score 1 <ul style="list-style-type: none"> <li>• Not Met: Provided remedy</li> <li>• Not Met: Evidence for lack of Impact or link</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Remedy satisfactory to stakeholders</li> <li>• Not Met: Remedy delivered</li> <li>• Not Met: Independent remedy process used</li> </ul>

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