

**Corporate Human Rights Benchmark  
2023 Company Scorecard**

**Company name** Columbia Sportswear  
**Sector** Apparel (supply chain only)  
**Overall score** 6.9 out of 100

Theme score	Out of	For theme
1.3	10	A. Governance and Policy Commitments
0.0	25	B. Embedding Respect and Human Rights Due Diligence
1.5	20	C. Remedies and Grievance Mechanisms
2.8	25	D. Performance: Company Human Rights Practices
1.4	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	<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: General HRs commitment: The Code of Business Conduct and Ethics indicates: 'We respect and protect human rights and we are committed to decent and humane working conditions. We do not tolerate any conduct that contributes to, encourages or facilitates human trafficking, child labor, forced or compulsory labor, or any other human rights abuses. This is true not only for our own workforce, but also for the employees of the manufacturers we contract with around the world'. [Code of Business Conduct and Ethics, 22/04/2022: <a href="https://d1io3yog0oux5.cloudfront.net">d1io3yog0oux5.cloudfront.net</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>Not Met: Commitment to UNGPs: The 2021 California Transparency in Supply Chains Act indicates: 'CSC [Columbia Sportswear Company] strives to comply with the UN Guiding Principles on Business and Human Rights (UNGPs)'. However, on the one hand, 'strive to' is not considered a formal statement of commitment according to CHRB wording criteria. On the other hand only policy commitments are considered a suitable source for this indicator under CHRB revised approach. [2021 Transparency in Supply Chain Statement, 12/2021: <a href="https://cscworkday.blob.core.windows.net">cscworkday.blob.core.windows.net</a>]</li> <li>Not Met: Commitment to OECD MNE Guidelines</li> </ul>
A.1.2.a	Commitment to respect the human rights of workers: ILO	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: Commitment to ILO core principles</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
	Declaration on Fundamental Principles and Rights at Work		<ul style="list-style-type: none"> <li>• Not Met: Explicitly lists all four ILO core principles: The Code of Business Conduct and Ethics indicates: 'We do not tolerate any conduct that contributes to, encourages or facilitates human trafficking, child labor, forced or compulsory labor, or any other human rights abuses. [...] we do not tolerate discrimination or harassment [...]'. However, no policy statement found including explicit commitments to respect freedom of association and the right to collective bargaining. [Code of Business Conduct and Ethics, 22/04/2022: <a href="http://d1io3yog0oux5.cloudfront.net">d1io3yog0oux5.cloudfront.net</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Expects suppliers to commit to ILO core principles: The Standards of Manufacturing Practices has explicit requirements regarding each ILO core area: discrimination, forced labour, child labour, freedom of association and collective bargaining, as indicated below. [Standards of Manufacturing Practices, N/A: <a href="http://d1io3yog0oux5.cloudfront.net">d1io3yog0oux5.cloudfront.net</a>]</li> <li>• Met: Explicitly lists all four ILO core principles for suppliers: The Standards of Manufacturing Practices 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 elaborates: 'Supplier must recognize and respect the right of employees to associate, organize and bargain collectively. Where the right to freedom of association and collective bargaining is restricted under law, the supplier allows the development of parallel means for independent and free association and bargaining'. [Standards of Manufacturing Practices, N/A: <a href="http://d1io3yog0oux5.cloudfront.net">d1io3yog0oux5.cloudfront.net</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: 'We are committed to maintaining a safe work environment. This means that we expect all work to be performed in accordance with health and safety rules, regulations and Company policies. This also means that violence in the workplace is never acceptable. If you see or experience any event that raises concerns about your safety or the safety of others, immediately alert your manager and follow any policies for your location related to reporting health and safety concerns'. [Code of Business Conduct and Ethics, 22/04/2022: <a href="http://d1io3yog0oux5.cloudfront.net">d1io3yog0oux5.cloudfront.net</a>]</li> <li>• Not Met: Commitment to ILO working hours standards or 48 hour regular work week</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 Standards of Manufacturing Practices indicates: 'Suppliers must provide a safe and healthy workplace setting to prevent accidents and injury to health arising out of, linked with, or occurring in the course of work or as a result of the operation of suppliers' facilities. Supplier must comply with all applicable laws and regulations and CSC health &amp; safety standards regarding working conditions, including any housing and cafeteria requirements'. [Standards of Manufacturing Practices, N/A: <a href="http://d1io3yog0oux5.cloudfront.net">d1io3yog0oux5.cloudfront.net</a>]</li> <li>• Met: Expects suppliers to commit to ILO working hours standards or 48 hour regular work week: The Standards of Manufacturing Practices indicates: 'Supplier must not require workers to work more than the regular and overtime hours allowed by the law of the country where the workers are employed. The regular work week shall not exceed 48 hours; other than in exceptional circumstances, the sum of regular and overtime hours in a week shall not exceed 60 hours. Supplier must allow workers at least 24 consecutive hours of rest in every seven-day period. All overtime work shall be consensual. Supplier must not request overtime on a regular basis and shall compensate all overtime work at a premium rate'. [Standards of Manufacturing Practices, N/A: <a href="http://d1io3yog0oux5.cloudfront.net">d1io3yog0oux5.cloudfront.net</a>]</li> </ul>
A.1.3.AP	Commitment to respect human rights particularly relevant to the sector – vulnerable groups (AP)	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: Commitment to women's rights</li> <li>• Not Met: Commitment to children's rights</li> <li>• Not Met: Commitment to migrant worker's rights</li> <li>• Met: Expects suppliers to respect these rights: The Company has a Foreign Migrant Worker Policy which 'applies to all CSC Suppliers and Supplier facilities'. It has comprehensive migrant related provisions it expects from suppliers, including: 'Supplier should have a written policy regarding its treatment of foreign migrant workers. The policy should, at a minimum, include the requirements of fair treatment, payment of employment eligibility fees, payment of transportation costs, repatriation and any requirements under country law. The Supplier must effectively communicate its migrant worker policy to its migrant worker employees</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>so that they are aware of their rights under the policy. And the Supplier shall train its staff responsible for implementing and enforcing its migrant worker policy regarding their roles and responsibilities. [...] Supplier's policy should include accommodating for communication in migrant worker's local language [...]. At a minimum, the Supplier's policy or code of conduct shall meet or exceed the standards included in this document'. [Foreign Migrant Worker Policy, 2018: <a href="https://cscworkday.blob.core.windows.net">cscworkday.blob.core.windows.net</a>]</p> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Commitment refers to CEDAW/Women's Empowerment Principles</li> <li>• Not Met: Commitment refers to Child Rights Convention/Business Principles</li> <li>• Not Met: Commitment refers to Convention on migrant workers</li> <li>• Not Met: Expects suppliers to respect these rights</li> </ul>
A.1.4	Commitment to remedy	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: Commitment to remedy adverse HRs impacts</li> <li>• Not Met: Expects suppliers to make this commitment</li> </ul> <p>Score 2</p> <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 2021 California Transparency in Supply Chains Act indicates: 'We work with the suppliers to develop a Corrective Action Plan (CAP) to remediate issues identified during the audit or assessment'. However, the commitment is expected to be broader than to work with supplier to develop CAPs following audits, a commitment to work with them to remedy any adverse human right impact caused. Moreover, only policy commitments are considered a suitable source for this indicator under CHRB revised approach. [2021 Transparency in Supply Chain Statement, 12/2021: <a href="https://cscworkday.blob.core.windows.net">cscworkday.blob.core.windows.net</a>]</li> </ul>
A.1.5	Commitment to respect the rights of human rights defenders	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Zero tolerance of threats/attacks on HRDs</li> <li>• Not Met: Expects suppliers to make this commitment</li> </ul> <p>Score 2</p> <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	<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 level responsibility for HRs: The Company states that 'Our Compliance Committee seeks to champion and foster a company culture of ethics and compliance consistent with our Code of Business Conduct and Ethics and related policies...Our Board, with support from the Compliance Committee and the Ethics and Compliance Program, oversees organizational structures, policies, and procedures at CSC to promote ethical conduct and compliance with laws and regulations.' Code of Business Conduct and Ethics includes human rights requirements. However, no evidence found that a board member of board committee has oversight responsibility for human rights policy commitments. [Code of Business Conduct and Ethics, 22/04/2022: <a href="https://d1io3yog0oux5.cloudfront.net">d1io3yog0oux5.cloudfront.net</a>] &amp; [2021 Environmental Social &amp; Governance Report, 31/12/2021: <a href="https://d1io3yog0oux5.cloudfront.net">d1io3yog0oux5.cloudfront.net</a>]</li> <li>• Not Met: Describes HRs expertise of Board member</li> </ul> <p>Score 2</p> <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	<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: Process to review HRs strategy at board level</li> <li>• Not Met: Example of HRs issues/trends discussed in last reporting period</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: 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</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> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <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	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Score of 1 on A.1.2.a</li> <li>• Not Met: Senior responsibility for HRs implementation and decision making</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Describes day-to-day responsibility for implementing HRs commitments</li> <li>• Not Met: Day-to-day resources and expertise allocation in own operations</li> <li>• Not Met: Resources and expertise allocation in supply chain</li> </ul>
B.1.2	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: 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> <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 senior management incentives for coherence with HRs policies</li> </ul>
B.1.3	Integration with enterprise risk management	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: HRs risks integrated as part of enterprise risk system</li> <li>• Not Met: Provides an example</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <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	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Score of 1 on A.1.2.a</li> <li>• Not Met: Communicates HRs policies to all workers in own operations</li> </ul> <p>Score 2</p> <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	<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: Meets ILO requirement for suppliers on A.1.2.a</li> <li>• Not Met: Describes steps to communicate HRs policies to supply chain</li> <li>• Not Met: Requires suppliers to communicate HRs policies</li> </ul> <p>Score 2</p> <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	<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 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> <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: Meets both requirements under score 1</li> <li>• Not Met: Trains suppliers to meet HRs commitments</li> <li>• Not Met: Discloses % suppliers trained</li> </ul>
B.1.6	Monitoring and corrective actions	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Score of 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 to assess manufacturing partners'</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>compliance with Standards of Manufacturing Practice (Supplier Code of Conduct) and local labor laws, it utilizes performance data from several sources. The Company discloses that 'Sources include: Unannounced audits performed by our internal Corporate Responsibility (CR) specialists and designated third party audit firms; Audits performed by external parties against other standards; Assessments performed by the ILO Better Work program; Verified assessments using the Social and Labor Convergence Program's (SLCP) Converged Assessment Framework'. However, no evidence found that the Company has a process to monitoring human rights compliance in its own operations. [2021 Environmental Social &amp; Governance Report, 31/12/2021: <a href="https://d1io3yog0oux5.cloudfront.net">d1io3yog0oux5.cloudfront.net</a>]</p> <ul style="list-style-type: none"> <li>• Not Met: Discloses % of supply chain monitored: The Company reports that 'In 2021, we worked with 392 finished goods manufacturing partner facilities (Tier 1), of which 82% had at least one audit or assessment performed during the year.24 We also began the expansion our Social Responsibility auditing program to include our processing manufacturing partners facilities (Tier 2) utilizing the SLCP assessment. In 2021, 36 Tier 2 manufacturing partner facilities received an SLCP verified assessment'. SLCP assessment refers to Social and Labour Convergence Program (SLCP) Common Assessment Framework (CAF). however, it is not clear the percentage of total supply chain monitored or the proportion of tier 2 that 36 suppliers represent. [2021 Environmental Social &amp; Governance Report, 31/12/2021: <a href="https://d1io3yog0oux5.cloudfront.net">d1io3yog0oux5.cloudfront.net</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: The Company discloses that for these suppliers 'do not fully meet minimum compliance requirement, corrective action plan of non-compliance are expected no later than the coming 3 months. And is shown to have immediate risk from their manufacturing practice and product/material testing.' However, no evidence found on the details of corrective action plan. [2021 Environmental Social &amp; Governance Report, 31/12/2021: <a href="https://d1io3yog0oux5.cloudfront.net">d1io3yog0oux5.cloudfront.net</a>]</li> <li>• Not Met: Discloses findings and number of correction action processes</li> </ul>
B.1.7	Engaging and terminating business relationships	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: HRs performance affects selection suppliers</li> <li>• Not Met: HRs performance affects continuation supplier relationships</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	<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>• Not Met: Describes process for identifying risks in business relationships</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	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 assessment process and discloses salient HRs risks</li> <li>• Not Met: Describes how process applies to supply chain</li> <li>• Not Met: Public disclosure of results of HRs risk assessment</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>

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.3	Integrating and acting on human rights risks and impact assessments	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Describes system to prevent, mitigate and remediate HRs issues</li> <li>• Not Met: Describes how global system applies to supply chain</li> <li>• Not Met: Example of actions decided on at least 1 salient HRs issue</li> </ul> Score 2 <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	The individual elements of the assessment are met or not as follows: Score 1 <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> Score 2 <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	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Provides two examples of comms with stakeholders</li> </ul> Score 2 <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	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Met: Grievance mechanism accessible to all workers: The Company states that ‘We encourage you to speak-up any time you believe there has been a violation of our Code. You are always encouraged to bring questions or concerns to’ their manager, HR representative, Ethics and Compliance Team, and Compliance Committee. It also indicates that ‘If you feel uncomfortable discussing your questions or concerns in person, or if you are concerned that your manager or other member of management may be involved, our Compliance Line offers two easy options for you to report ethics and compliance concerns via phone or online. The reporting services are available 24-hours a day, 7 days a week, and anonymous reporting is available where allowed by law.’ [Code of Business Conduct and Ethics, 22/04/2022: <a href="https://d1io3yog0oux5.cloudfront.net">d1io3yog0oux5.cloudfront.net</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Grievance mechanism available in appropriate languages and workers made aware: The Company reports that ‘If you would like to make a report in your local language, we encourage you to use the toll-free phone option to ensure our Ethics &amp; Compliance team receives as accurate a translation as possible. Our reporting solution also offers the option to display the report form in your preferred language.’ However, no evidence found that how the Company ensures its workers are aware of the reporting system. [Code of Business Conduct and Ethics, 22/04/2022: <a href="https://d1io3yog0oux5.cloudfront.net">d1io3yog0oux5.cloudfront.net</a>]</li> <li>• Not Met: Describes how workers in supply chain access grievance mechanism</li> <li>• Not Met: Expects suppliers to convey expectation to their suppliers</li> </ul>
C.2	Grievance mechanism(s) for external individuals and communities	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Grievance mechanism accessible to all external individuals and communities: The Company states that ‘We encourage you to speak-up any time you believe there has been a violation of our Code.’ However, it does not specify that external stakeholders can raise concerns. [Code of Business Conduct and Ethics, 22/04/2022: <a href="https://d1io3yog0oux5.cloudfront.net">d1io3yog0oux5.cloudfront.net</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <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</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	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 how users engaged on design and performance</li> <li>• Not Met: Provides user engagement examples (at least two) on design and performance</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
	the mechanism(s)		Score 2 <ul style="list-style-type: none"> <li>• Not Met: Describes how users engaged on improvement of mechanism</li> <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	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Describes procedure and timescales for managing complaints or concerns: The Company states that 'We take steps to promptly investigate good faith reports of potential violations of our Code, our policies or the law, and we take appropriate action in response'. However, no evidence found on the procedures for informing the complainant and timescales for addressing concerns. [Code of Business Conduct and Ethics, 22/04/2022: <a href="https://d1io3yog0oux5.cloudfront.net">d1io3yog0oux5.cloudfront.net</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Describes technical, financial, advisory support to enable equal access</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</li> </ul>
C.5	Prohibition of retaliation for raising complaints or concerns	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Met: Public statement prohibiting retaliation against workers/stakeholders: The Company indicates that 'We do not tolerate retaliation against anyone who raises a compliance concern in good faith or participates in an internal investigation.' [Code of Business Conduct and Ethics, 22/04/2022: <a href="https://d1io3yog0oux5.cloudfront.net">d1io3yog0oux5.cloudfront.net</a>]</li> <li>• Not Met: Describes practical measures to prevent retaliation: The Company states that 'Employees who retaliate or attempt to retaliate against anyone who reports a concern in good faith or participates in an internal investigation are subject to discipline up to and including termination of employment. Anyone who believes they have experienced retaliation for raising a compliance related concern should report it immediately using the resources defined in the Code'. However, it is not clear if relevant managers and employees are trained on these procedures. The Company also states that 'in most countries, anonymous reporting is available. If you are making a report from a location where anonymous reporting is limited, you will be asked to provide your name or you may raise your concern directly with management'. It is not clear however, whether there are alternative measures to prevent retaliation where anonymity is not allowed. [Code of Business Conduct and Ethics, 22/04/2022: <a href="https://d1io3yog0oux5.cloudfront.net">d1io3yog0oux5.cloudfront.net</a>]</li> </ul> Score 2 <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	The individual elements of the assessment are met or not as follows: Score 1 <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> Score 2 <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	The individual elements of the assessment are met or not as follows: Score 1 <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> Score 2 <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	The individual elements of the assessment are met or not as follows: Score 1 <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> Score 2 <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 ‘Every worker has a right to compensation for a regular work week that is sufficient to meet the worker’s basic needs and provide some discretionary income. Supplier must pay at least the minimum wage or the appropriate prevailing wage, whichever is higher, comply with all legal requirements on wages, and provide any benefits required by law.’ However, paying over a minimum wage does not imply paying a living wage. No evidence found of time-bound target to pay all workers a living wage. [Standards of Manufacturing Practices, N/A: <a href="https://d1io3yog0oux5.cloudfront.net">d1io3yog0oux5.cloudfront.net</a>]</li> <li>• Not Met: Describes work with suppliers on living wage</li> </ul> <p>Score 2</p> <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	<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 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> <p>Score 2</p> <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	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: Identifies direct and indirect suppliers including manufacturing sites: The Company has disclosed its four lists of facilities through Transparency Map. The lists include Columbia Sportswear Company Factory List, Columbia Sportswear Factory List, Mountain Hardwear Factory List, prAna Facility List, and Sorel Facility List. The Company reports that at the point of reporting, ‘this map represents 99% of our finished goods factories supply chain. The total processing factories on the map account for about 80% of our total business volume.’ The lists contain information of id, contribution date, name, address, country, number of workers, etc. [Our Supply Chain: Transparency Map, N/A: <a href="https://columbiasportswearcompany.com">columbiasportswearcompany.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Discloses names and locations of significant parts of supply chain and how significance was defined: As indicated above, names and locations of significant suppliers are disclosed in the map, representing 80% of business volume, including finished goods and processing factories. [Our Supply Chain: Transparency Map, N/A: <a href="https://columbiasportswearcompany.com">columbiasportswearcompany.com</a>]</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	<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 child labour in supplier codes and contracts: The Company states that ‘Supplier must only employ people who (a) meet the local legal minimum age for employment, (b) meet the age for completing compulsory education in the country of manufacture, or (c) are at least 15 years old, whichever is higher.’ However, no evidence found on the requirements for verifying the age of workers recruited and remediation programs for child labour. [Standards of Manufacturing Practices, N/A: <a href="https://d1io3yog0oux5.cloudfront.net">d1io3yog0oux5.cloudfront.net</a>]</li> <li>• Not Met: Describes work with suppliers on eliminating child labour</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <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	<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 debt/fees in supplier codes and contracts</li> <li>• Not Met: Describes work with suppliers on debt/fees for job seekers/workers</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Assessment scope of payment of recruitment fees in supply chain</li> <li>• Not Met: Analysis of trends demonstrating progress</li> </ul>



Indicator Code	Indicator name	Score (out of 2)	Explanation
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> <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	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 free movement in supplier codes and contracts</li> <li>• Not Met: Describes working with suppliers on free movement of workers</li> </ul> Score 2 <ul style="list-style-type: none"> <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 'Supplier must recognize and respect the right of employees to associate, organize and bargain collectively. Where the right to freedom of association and collective bargaining is restricted under law, the supplier allows the development of parallel means for independent and free association and bargaining.' However, no evidence found that the Company has a requirement for prohibiting intimidation, harassment, and retaliation against trade union members and representatives. [Standards of Manufacturing Practices, N/A: <a href="https://d1io3yog0oux5.cloudfront.net">d1io3yog0oux5.cloudfront.net</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 'Suppliers must provide a safe and healthy workplace setting to prevent accidents and injury to health arising out of, linked with, or occurring in the course of work or as a result of the operation of suppliers' facilities. Supplier must comply with all applicable laws and regulations and CSC health &amp; safety standards regarding working conditions, including any housing and cafeteria requirements'. However, no details found on specific requirements on different health and safety areas. [Standards of Manufacturing Practices, N/A: <a href="https://d1io3yog0oux5.cloudfront.net">d1io3yog0oux5.cloudfront.net</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> </ul> Score 2 <ul style="list-style-type: none"> <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> <li>• Not Met: Describes work with suppliers on women's rights</li> </ul> Score 2 <ul style="list-style-type: none"> <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>

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.2.9.b	Working hours (in the supply chain)	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Requirements on working hours in codes/contracts with suppliers: The Company states that ‘Supplier must not require workers to work more than the regular and overtime hours allowed by the law of the country where the workers are employed. The regular work week shall not exceed 48 hours; other than in exceptional circumstances, the sum of regular and overtime hours in a week shall not exceed 60 hours. Supplier must allow workers at least 24 consecutive hours of rest in every seven-day period. All overtime work shall be consensual. Supplier must not request overtime on a regular basis and shall compensate all overtime work at a premium rate.’ [Standards of Manufacturing Practices, N/A: <a href="https://d1io3yog0oux5.cloudfront.net">d1io3yog0oux5.cloudfront.net</a>]</li> <li>• Not Met: Describes work with suppliers on working hours</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Assesment 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		No allegations meeting the CHRB severity threshold were found, and so the score of 5.53 out of 80 points scored in themes A-D has been applied to produce a score of 1.38 out of 20 points for theme E.

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