

**Corporate Human Rights Benchmark  
2023 Company Scorecard**

**Company name** Ferragamo  
**Sector** Apparel (supply chain only)  
**Overall score** 11.7 out of 100

Theme score	Out of	For theme
1.9	10	A. Governance and Policy Commitments
1.4	25	B. Embedding Respect and Human Rights Due Diligence
4.5	20	C. Remedies and Grievance Mechanisms
1.6	25	D. Performance: Company Human Rights Practices
2.3	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 Sustainability Policy indicates: 'The Salvatore Ferragamo Group is committed to conducting all its activities in accordance with Human and Workers' Rights, as acknowledged by national and international conventions and declarations'. [Sustainability Policy, 2017: <a href="https://www.ferragamo.com/csr">csr.ferragamo.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Not Met: Commitment to UNGPs</li> <li>Not Met: Commitment to OECD MNE Guidelines</li> </ul>
A.1.2.a	Commitment to respect the human rights of workers: ILO Declaration on Fundamental Principles and Rights at Work	1.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Met: Commitment to ILO core principles: As indicated below, the Company's SA8000 Policy covers each ILO Core commitment: discrimination, forced labour, child labour, freedom of association and collective bargaining. [SA8000 Policy, 24/04/2019: <a href="https://www.ferragamo.com/group">group.ferragamo.com</a>]</li> <li>Met: Explicitly lists all four ILO core principles: The Company's SA8000 Policy covers each ILO Core commitment: discrimination, forced labour, child labour, freedom of association and collective bargaining. As for freedom of association and collective bargaining, it adds: 'This implies respecting and protecting workers' freedom of association, not hindering their membership in trade unions and promoting collective bargaining'. [SA8000 Policy, 24/04/2019: <a href="https://www.ferragamo.com/group">group.ferragamo.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Expects suppliers to commit to ILO core principles: The Supplier Code of Conduct indicates: ‘The recipients are required to respect human rights, including the rights of the workers, within their activities and operations, recognizing without any distinction freedom and equality in dignity and the rights of human beings, as enshrined in [...] the fundamental Conventions of the International Labour Organization (ILO)’. [Supplier Code of Conduct, 05/2021: <a href="http://group.ferragamo.com">group.ferragamo.com</a>]</li> <li>• Not Met: Explicitly lists all four ILO core principles for suppliers: The Supplier Code of Conduct 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: ‘The Group promotes freedom of association and collective bargaining, an enabling right for the participation of workers and the protection of their rights. The recipients are required to guarantee the right of workers to form trade unions and to bargain collectively, without distinction or discrimination and without fear of repercussions, in accordance with applicable laws and regulations’. However, it is not clear whether the Company requires to respect those rights in all contexts, as it indicates ‘in accordance with applicable laws and regulations’. 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. [Supplier Code of Conduct, 05/2021: <a href="http://group.ferragamo.com">group.ferragamo.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 SA8000 Policy indicates that protecting the health and safety of workers and their well-being ‘implies providing a healthy and safe workplace environment, taking effective steps to protect the wellbeing of workers, and prevent accidents and damage to their health during their engagement in the company’. [SA8000 Policy, 24/04/2019: <a href="http://group.ferragamo.com">group.ferragamo.com</a>]</li> <li>• Not Met: Commitment to ILO working hours standards or 48 hour regular work week: The SA8000 Policy indicates that respecting the right to ‘fair working hours [...] implies respecting the applicable laws concerning working hours, breaks and public holidays, guaranteeing a living wage and minimum income’. 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. [SA8000 Policy, 24/04/2019: <a href="http://group.ferragamo.com">group.ferragamo.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 Supplier Code of Conduct indicates: ‘The Group identifies as its primary values the principle of protection of health and safety at work. The recipients are required to respect the legislation in force on health and safety, guaranteeing to their employees and collaborators a safe, hygienic and healthy work environment, taking into consideration the sector in which they operate and the risks connected to the activities and operations carried out’. [Supplier Code of Conduct, 05/2021: <a href="http://group.ferragamo.com">group.ferragamo.com</a>]</li> <li>• Met: Expects suppliers to commit to ILO working hours standards or 48 hour regular work week: The Supplier Code of Conduct indicates: ‘The recipients are required to ensure full compliance with the regulations and collective labour agreements on working hours and overtime, including breaks, rest days, holidays and leave for any reason. In particular, the recipients are required to guarantee to their employees a maximum of working and overtime hours, in alignment with the provisions of the ILO Conventions on the topic’. It expands on the regulation it refers it when quoting the ILO Conventions: ‘Hours of Work (Industry) Convention (C001); Hours of Work (Commerce and Offices) Convention (C030); Forty-Hour Week Convention (C047); Reduction of Hours of Work Recommendation (R116)’. [Supplier Code of Conduct, 05/2021: <a href="http://group.ferragamo.com">group.ferragamo.com</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>• Met: Commitment to children's rights: The Policy for Combating Child Labour indicates: ‘The Company commits to performing its activities with full respect of fundamental rights in relation to the rights of the child and the minimum age for work, as expressed by national and international conventions and regulations, including Company documentation’. [Policy for Combating Child Labour, 24/04/2019: <a href="http://group.ferragamo.com">group.ferragamo.com</a>]</li> <li>• Not Met: Expects suppliers to respect these rights</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Commitment refers to Child Rights Convention/Business Principles: See above. The Policy for Combating Child Labour also indicates: 'In particular, the Company undertakes the following: not to take advantage of or support in any way child labour, in line with what established by current legislation, the ILO Conventions on the subject and the International Convention on the Rights of the Child'. [Policy for Combating Child Labour, 24/04/2019: <a href="http://group.ferragamo.com">group.ferragamo.com</a>]</li> <li>• Not Met: Expects suppliers to respect these rights: The Supplier Code of Conduct indicates: 'The recipients are required to condemn and abstain themselves from engaging in any form of child labour, in line with the provisions of the legislation currently in force, the ILO Conventions on the subject and the International Convention on the Rights of the Child'. However, although the Company condemns the use of child labour, it is not clear the Company expects suppliers to respect children's rights, as such expectation could not be found. [Supplier Code of Conduct, 05/2021: <a href="http://group.ferragamo.com">group.ferragamo.com</a>]</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: The Policy for Combating Child Labour contains provisions for remedial actions in the context of child labour. However, no publicly available statement found of a commitment it to remedy the adverse impacts on individuals and workers and communities that it has caused or contributed to in a broader sense. [Policy for Combating Child Labour, 24/04/2019: <a href="http://group.ferragamo.com">group.ferragamo.com</a>]</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</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	0.5	<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: Board level responsibility for HRs: The Company indicates that the Control and Risk Committee examines the company's policies on human rights. [Corporate Governance Report 2022: <a href="http://group.ferragamo.com">group.ferragamo.com</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> <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>• Met: Score of 1 on A.1.2.a</li> <li>• Not Met: Senior responsibility for HRs implementation and decision making: The Company indicates that it has a committee, called the Social Performance Team (SPT), composed of a balanced number of representatives of workers and management that oversees the implementation and correct application of the SA8000 standard, which comprises human rights. However, no information related to senior manager roles accountable for implementation and decision making on human rights was found. [2021 Annual Report, 2022: <a href="https://sustainability.ferragamo.com">sustainability.ferragamo.com</a>]</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	0.5	<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: HRs risks integrated as part of enterprise risk system: The Company indicates that it is committed to identifying the main business risks and implementing adequate instruments to manage them, through a model consistent with the recognized standards of Enterprise Risk Management (ERM), and as regards social aspects and respect of human rights, it monitors risks connected to the violation of labour laws, as well as inadequate procurement and supply chain model. [2021 Modern Slavery Statement, 12/07/2022: <a href="https://group.ferragamo.com">group.ferragamo.com</a>] &amp; [2021 Annual Report, 2022: <a href="https://sustainability.ferragamo.com">sustainability.ferragamo.com</a>]</li> <li>• Not Met: Provides an example</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Risk assessment 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>• Met: Score of 1 on A.1.2.a</li> <li>• Not Met: Communicates HRs policies to all workers in own operations: The Company indicates in its SA8000 policy, which comprises human rights, that is committed 'to ensuring that the social responsibility principles of the Standard are disseminated, understood and respected by workers, members of the supply chain and other interested parties, promoting their involvement and advocating fruitful and constructive interaction'. However, no information was found related to how it communicates its policy commitment to all its workers, including in local languages where necessary. [SA8000 Policy, 24/04/2019: <a href="https://group.ferragamo.com">group.ferragamo.com</a>]</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	0.5	<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: 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>• Met: Requires suppliers to communicate HRs policies: The Company states that the suppliers are responsible for guaranteeing their own compliance with the Supplier Code of Conduct, which comprises human rights, as well as for disseminating it and asking their employees, suppliers, and external collaborators to comply with it. [Supplier Code of Conduct, 05/2021: <a href="https://group.ferragamo.com">group.ferragamo.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Describes how HRs policies are contractual/binding for suppliers: The Company states that 100% of suppliers and contract manufacturers are required to sign and comply with the principles contained in the Suppliers' Code of Conduct</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			and the Code of Ethics, which also cover the protection of human rights. [2021 Annual Report, 2022: <a href="https://sustainability.ferragamo.com">sustainability.ferragamo.com</a> ] <ul style="list-style-type: none"> <li>• Not Met: Requires suppliers to cascade contractual/binding HRs policies to its suppliers: The Company states that the suppliers are responsible for disseminating the Supplier Code of Conduct, which comprises human rights, and asking their suppliers, and external collaborators to comply with it. However, it is not clear if this is presented as a requirement and no information related to contractual bindings was found. [Supplier Code of Conduct, 05/2021: <a href="https://group.ferragamo.com">group.ferragamo.com</a>]</li> </ul>
B.1.5	Training on Human Rights	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• 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>• Met: Trains suppliers to meet HRs commitments: The Company states that initiatives have been taken for the Supplier Code of Conduct's implementation, which covers human rights, providing information and training to recipients, as well as support to achieve full compliance with the principles and provisions contained therein, including prevention of modern slavery along the entire supply chain. In particular, training workshops were held for the main suppliers of finished products and third-party workers (who together cover more than 70% of Ferragamo products). [2021 Modern Slavery Statement, 12/07/2022: <a href="https://group.ferragamo.com">group.ferragamo.com</a>]</li> <li>• Met: Discloses % suppliers trained: The Company states that 'training workshops were held for the main suppliers of finished products and third-party workers (who together cover more than 70% of Ferragamo products).' [2021 Modern Slavery Statement, 12/07/2022: <a href="https://group.ferragamo.com">group.ferragamo.com</a>]</li> </ul>
B.1.6	Monitoring and corrective actions	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• 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 in order to monitor actual compliance with the principles set out in the Suppliers' Code of Conduct, which include human rights, it launched an audit plan on its direct contract manufacturers and suppliers. However, no information related to its own operations was found. [2021 Annual Report, 2022: <a href="https://sustainability.ferragamo.com">sustainability.ferragamo.com</a>]</li> <li>• Not Met: Discloses % of supply chain monitored: During 2021, 35 self-assessments and 74 audits were carried out, involving direct suppliers, as well as subcontractors. However, it is not clear how much this percentage does this number represents in relation to all supply chain. [2020 Annual Report, 30/03/2021: <a href="https://sustainability.ferragamo.com">sustainability.ferragamo.com</a>]</li> <li>• Not Met: Describes how workers are involved in monitoring</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: Describes corrective actions process: It indicates that: 'Based on the results of the audit, in case of non-compliance with the provisions of the Code, the addressees are obliged to implement the actions required to adjust their activities and operations in order to remove, prevent or mitigate any identified non-compliance. The plan envisaged specific actions to be implemented within agreed deadlines or suggestions for improvement activities'. However, no description of the corrective process in its own operations was found. [2021 Annual Report, 2022: <a href="https://sustainability.ferragamo.com">sustainability.ferragamo.com</a>]</li> <li>• Met: Discloses findings and number of correction action processes: The Company indicates that, with reference to the non-conformities identified, 32 follow-ups were conducted to verify the corrective measures implemented. Among these, the most significant critical issues that emerged in 2021 were related to compliance with occupational health and safety standards and to respect for human and workers' rights; these last non-conformities were exclusively related to subcontractors. [2021 Annual Report, 2022: <a href="https://sustainability.ferragamo.com">sustainability.ferragamo.com</a>]</li> </ul>
B.1.7	Engaging and terminating 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: HRs performance affects selection suppliers</li> <li>• Met: HRs performance affects continuation supplier relationships: The Company indicates that in the event of serious or repeated violations of the Supplier Code, the Group reserves the right to terminate business relations with suppliers, as well as in the event of failure to implement the agreed improvement plan for the removal of any major non-conformities or failure to cooperate in the</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			implementation of monitoring activities. [2021 Annual Report, 2022: <a href="https://sustainability.ferragamo.com">sustainability.ferragamo.com</a> ] Score 2 <ul style="list-style-type: none"> <li>• Not Met: Describes positive HRs incentives for business relationships</li> <li>• Met: Works with suppliers to meet HRs requirements: The Company states that initiatives have been taken for the Supplier Code of Conduct's implementation, which covers human rights, providing information and training to recipients, as well as support to achieve full compliance with the principles and provisions contained therein, including prevention of modern slavery along the entire supply chain. In particular, training workshops were held for the main suppliers of finished products and third-party workers (who together cover more than 70% of Ferragamo products). [2022 Modern Slavery Statement: <a href="https://sustainability.ferragamo.com">sustainability.ferragamo.com</a>]</li> </ul>
B.1.8	Approach to engagement with affected 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: 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> Score 2 <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	The individual elements of the assessment are met or not as follows: Score 1 <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> Score 2 <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	The individual elements of the assessment are met or not as follows: Score 1 <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: The Company indicates that risk elements in the supply chain are assessed, in terms of impact and likelihood of occurrence, with respect to human rights, child labor, forced and compulsory labor, non-discrimination, freedom of association and collective bargaining, occupational health and safety, working time, remuneration and regularity of working conditions and applied disciplinary practices. However, it is not clear if the Company takes into account relevant factors. [2021 Modern Slavery Statement, 12/07/2022: <a href="https://group.ferragamo.com">group.ferragamo.com</a>]</li> <li>• Not Met: Public disclosure of results of HRs risk assessment</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 assessment involved affected stakeholders</li> </ul>
B.2.3	Integrating and acting on human rights risks and impact assessments	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: 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: The Company states that 'The Salvatore Ferragamo Group constantly monitors the effectiveness of actions and measures in place for an ethical and responsible business conduct, including measures taken to mitigate modern slavery risks.' However, no description of the system for evaluation was found. [2021 Modern Slavery Statement, 12/07/2022: <a href="https://group.ferragamo.com">group.ferragamo.com</a>]</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>

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.5	Communicating on human rights impacts	0	The individual elements of the assessment are met or not as follows: Score 1 • Not Met: Provides two examples of comms with stakeholders Score 2 • Not Met: Describes challenges to effective comms and how it is working to address them

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.1	Grievance mechanism(s) for workers	1.5	The individual elements of the assessment are met or not as follows: Score 1 • Met: Grievance mechanism accessible to all workers: The Company indicates that it is possible to report any failure to comply with the Code of Ethics and internal procedures, as well as applicable laws and regulations, through dedicated channels such as the whistleblowing system, which covers the entire Group. Reports can also be made by external parties by contacting the Group Ethics Committee by email or regular mail. [2021 Annual Report, 2022: <a href="https://sustainability.ferragamo.com">sustainability.ferragamo.com</a> ] Score 2 • Not Met: Grievance mechanism available in appropriate languages and workers made aware: The Company made available to all employees an e-learning course on the Code of Ethics, on the Anti-Corruption Policy and on the whistleblowing tool. These courses are also mandated to new hires who become part of the Ferragamo Group. However, no evidence was found that this course is available in different languages. [2021 Annual Report, 2022: <a href="https://sustainability.ferragamo.com">sustainability.ferragamo.com</a> ] • Met: Describes how workers in supply chain access grievance mechanism: The Company indicates in the Supplier Code that for any report concerning an alleged and/or proven violation of the Code, it is possible to contact the Group Ethics Committee through mail or email. [Supplier Code of Conduct, 05/2021: <a href="https://group.ferragamo.com">group.ferragamo.com</a> ] • Not Met: Expects suppliers to convey expectation to their suppliers
C.2	Grievance mechanism(s) for external individuals and communities	1.5	The individual elements of the assessment are met or not as follows: Score 1 • Met: Grievance mechanism accessible to all external individuals and communities: The Company indicates that the whistleblowing policy has been provided to all recipients (employees, social bodies and collaborators working on behalf of the Group) and that reports can also be made by external parties by contacting the Group Ethics Committee by email or regular mail. [2021 Annual Report, 2022: <a href="https://sustainability.ferragamo.com">sustainability.ferragamo.com</a> ] Score 2 • Not Met: Grievance mechanism available in appropriate languages and affected stakeholders made aware • Met: Describes how external individuals/communities access grievance mechanism: The Company indicates that reports can also be made by external parties by contacting the Group Ethics Committee, which also receives complaints related to non-compliance with the supplier code. [2021 Annual Report, 2022: <a href="https://sustainability.ferragamo.com">sustainability.ferragamo.com</a> ] & [Supplier Code of Conduct, 05/2021: <a href="https://group.ferragamo.com">group.ferragamo.com</a> ] • Not Met: Expects supplier to convey expectation to their suppliers
C.3	Users are involved in the design and performance of the mechanism(s)	0	The individual elements of the assessment are met or not as follows: Score 1 • Not Met: Describes how users engaged on design and performance • Not Met: Provides user engagement examples (at least two) on design and performance Score 2 • Not Met: Describes how users engaged on improvement of mechanism • Not Met: Provides user engagement examples (at least two) on improvement
C.4	Procedures related to the mechanism(s) are equitable, publicly available and explained	0	The individual elements of the assessment are met or not as follows: Score 1 • Not Met: Describes procedure and timescales for managing complaints or concerns: The Ethics Committee, appointed by the Board of Directors, examines and investigates all complaints received to assess whether they are legitimate and take action as it sees fit. However, no timescales for addressing the complaints or concerns and for informing the complainant were found. [2021 Annual Report, 2022: <a href="https://sustainability.ferragamo.com">sustainability.ferragamo.com</a> ] • Not Met: Describes technical, financial, advisory support to enable equal access Score 2 • Not Met: Describe types of outcome to complainant through use of mechanism • Not Met: Describes escalation to senior levels / independent adjudicators

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.5	Prohibition of retaliation for raising complaints or concerns	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Public statement prohibiting retaliation against workers/stakeholders: The Company states in the SA8000 policy and the Supplier Code of Conduct, both of which comprise human rights, that, without prejudice to legal obligations, it is committed to treating every report received with confidentiality, privacy and without any form of retaliation. [Supplier Code of Conduct, 05/2021: <a href="http://group.ferragamo.com">group.ferragamo.com</a>] &amp; [SA8000 Policy, 24/04/2019: <a href="http://group.ferragamo.com">group.ferragamo.com</a>]</li> <li>• Met: Describes practical measures to prevent retaliation: The Company indicates that its whistleblower system is managed according to Italian and international best practices to provide a specific and confidential communication channel as well as ensure the anonymity of the whistleblower. [2021 Annual Report, 2022: <a href="http://sustainability.ferragamo.com">sustainability.ferragamo.com</a>]</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: The Company indicates that it encourages its suppliers to 'adopt and promote internal mechanisms and tools to guarantee to their employees the possibility of reporting proven or alleged human rights violations. In the implementation of these mechanisms, it is suggested to put in place protection systems for workers who report an alleged or proven violation in good faith'. However, no evidence that this includes other stakeholders was found. [Supplier Code of Conduct, 05/2021: <a href="http://group.ferragamo.com">group.ferragamo.com</a>]</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	0.5	<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: Discloses number of grievances filed, addressed or resolved and outcomes achieved: The Company states that 'In 2022, no reports or complaints were received with reference to issues related to human rights or violations of the Supplier Code of Conduct.' [2022 Annual Report, 31/12/2022: <a href="http://cdn.ferragamo.com">cdn.ferragamo.com</a>]</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</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>



Indicator Code	Indicator name	Score (out of 2)	Explanation
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</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 in its Supplier Code of Conduct that its suppliers are required to condemn and abstain themselves from engaging in any form of child labour, in line with the provisions of the legislation currently in force, the ILO Conventions on the subject and the International Convention on the Rights of the Child. In particular, no minor younger than 16 shall work in the name of/ or on behalf of the recipients, if they have not concluded the mandatory period of education, subject to relevant exceptions provided for in existing laws and regulations. It also indicates that minors under the age of 18 must not work during night-time and be exposed to dangerous activities and the respect of their physical, mental and emotional development must be guaranteed. However, no requirement related to verifying the age of workers recruited and remediation programmes was found. [Supplier Code of Conduct, 05/2021: <a href="http://group.ferragamo.com">group.ferragamo.com</a>]</li> </ul> <ul style="list-style-type: none"> <li>• Not Met: Describes work with suppliers on eliminating child labour: The Company states that 'the Company is committed to develop progressively initiatives aimed at promoting the culture of child protection and supporting the dissemination of these principles with interested parties, including their own supply chain, in line with the provisions of the Group Supplier Code of Conduct.' However, there are no descriptions about this commitments or practical measures about it. [Policy for Combating Child Labour, 24/04/2019: <a href="http://group.ferragamo.com">group.ferragamo.com</a>]</li> </ul> Score 2 <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	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 debt/fees in supplier codes and contracts: The Company indicates that suppliers must refrain from requesting a payment as a deposit as a condition of employment, however, no prohibition related to third-party recruitment intermediaries imposing financial burdens on job seekers and workers was found. [Supplier Code of Conduct, 05/2021: <a href="http://group.ferragamo.com">group.ferragamo.com</a>]</li> </ul> <ul style="list-style-type: none"> <li>• Not Met: Describes work with suppliers on debt/fees for job seekers/workers</li> </ul> Score 2 <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>
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>

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.2.5.f	Prohibition of forced labour: Restrictions on workers (in the supply chain)	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Requirements on free movement in supplier codes and contracts: The Company states in its Supplier Code that: 'In particular, the recipients must abstain themselves from engaging in any form of modern slavery including, but not limited to, resorting to non-voluntary work; retaining the worker's original documents; requesting a payment as a deposit as a condition of employment; operating restrictions on the freedom of movement of employees'. [Supplier Code of Conduct, 05/2021: <a href="http://group.ferragamo.com">group.ferragamo.com</a>]</li> <li>• Not Met: Describes working with suppliers on free movement of workers</li> </ul> <p>Score 2</p> <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	<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 FoA/CB in suppliers codes and contracts: The Company states that its suppliers are required to guarantee the right of workers to form trade unions and to bargain collectively, without distinction or discrimination and without fear of repercussions, in accordance with applicable laws and regulations. However, no specific prohibition of intimidation, harassment, retaliation and violence against trade union members and trade union representatives was found. Furthermore, it is not clear if the requirement to respect the right to Freedom of Association and Collective Bargaining in all circumstances. [Supplier Code of Conduct, 05/2021: <a href="http://group.ferragamo.com">group.ferragamo.com</a>]</li> <li>• Not Met: Describes work with suppliers on FoA/CB</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <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)	0.5	<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: Requirements on H&amp;S in supplier codes and contracts: The Company states that its suppliers are required to respect the legislation in force on health and safety, guaranteeing to their employees and collaborators a safe, hygienic and healthy work environment, taking into consideration the sector in which they operate and the risks connected to the activities and operations carried out. However, no specific and clear health and safety requirements were found. [Supplier Code of Conduct, 05/2021: <a href="http://group.ferragamo.com">group.ferragamo.com</a>]</li> <li>• Met: Discloses injury rate or lost days in supply chain in last reporting period: The Company states that 'In 2022, there were 57 injuries among employees [...]' The rate for recordable work-related injuries was 0.6 in 2022. [2022 Annual Report, 31/12/2022: <a href="http://cdn.ferragamo.com">cdn.ferragamo.com</a>]</li> <li>• Met: Discloses fatalities for workers in supply chain in last reporting period: The Company states that 'there were no fatalities among either employees or contractors.' [2022 Annual Report, 31/12/2022: <a href="http://cdn.ferragamo.com">cdn.ferragamo.com</a>]</li> <li>• Not Met: Discloses occupational disease rate in supply chain in last reporting period</li> </ul> <p>Score 2</p> <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	<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 women's rights in contracts/codes with suppliers</li> <li>• Not Met: Describes work with suppliers on women's rights</li> </ul> <p>Score 2</p> <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>
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 its suppliers are 'required to ensure full compliance with the regulations and collective labour agreements on working hours and overtime, including breaks, rest days, holidays and leave for any reason. In particular, the recipients are required to guarantee to their employees a maximum of working and overtime hours, in alignment with the provisions of the ILO Conventions on the topic'. [Supplier Code of Conduct, 05/2021: <a href="http://group.ferragamo.com">group.ferragamo.com</a>]</li> <li>• Not Met: Describes work with suppliers on working hours</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			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		No allegations meeting the CHRB severity threshold were found, and so the score of 9.36 out of 80 points scored in themes A-D has been applied to produce a score of 2.34 out of 20 points for theme E.

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