

**Corporate Human Rights Benchmark
2023 Company Scorecard**

Company name Foot Locker
Sector Apparel (supply chain and own operations)
Overall score 4.8 out of 100

Theme score	Out of	For theme
1.6	10	A. Governance and Policy Commitments
0.9	25	B. Embedding Respect and Human Rights Due Diligence
1.0	20	C. Remedies and Grievance Mechanisms
0.3	25	D. Performance: Company Human Rights Practices
1.0	20	E. Performance: Responses to Serious Allegations

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

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

Detailed assessment

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

A.1 Policy Commitments (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1.1	Commitment to respect human rights	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Met: General HRs commitment: The Global Human Rights Statement indicates: 'The Company is dedicated to support and uphold the provision of basic human rights and to eliminate discriminatory practices. [...] This Statement emphasizes the Company's commitment to basic human rights as a core component of the way it does business and how it engages its employees'. [Global Human Rights Statement, N/A: investors.footlocker-inc.com] Score 2 <ul style="list-style-type: none"> Not Met: Commitment to UNGPs Not Met: Commitment to OECD MNE Guidelines
A.1.2.a	Commitment to respect the human rights of workers: ILO Declaration on Fundamental Principles and Rights at Work	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not Met: Commitment to ILO core principles Not Met: Explicitly lists all four ILO core principles: The Code of Business Conduct indicates: 'We uphold human rights in all of our operations and facilities and watch for indicators of exploitation of children, physical punishment, abuse, or involuntary servitude. [...] We are all responsible for preserving a work environment of mutual respect free from discrimination'. However, no policy statement found explicitly committing to respect freedom of association and the right to collective bargaining. [Code of Business Conduct, N/A: investors.footlocker-inc.com] Score 2 <ul style="list-style-type: none"> Not Met: Expects suppliers to commit to ILO core principles

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> Met: Explicitly lists all four ILO core principles for suppliers: The Global Sourcing Guidelines has explicit requirements regarding discrimination, forced labour, child labour, freedom of association and collective bargaining. As for freedom of association and collective bargaining, it elaborates: 'Suppliers must respect the right to free association and grant their workers the right to bargain collectively without unlawful interference'. As for the document itself, it indicates: 'These Guidelines require all of Foot Locker's suppliers to respect certain employment standards that Foot Locker believes are universal'. Although it is called 'Guidelines', it seems to function as the Company's supplier code of conduct. [Global Sourcing Guidelines, 2022: investors.footlocker-inc.com]
A.1.2.b	Commitment to respect the human rights of workers: Health and safety and working hours	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Met: Commitment to respect H&S of workers: The Global Occupational Health and Safety Statement indicates: 'Foot Locker, Inc. is committed to operate in a safe and responsible manner to protect the health and safety of its employees, partners, and customers. It is the Company's responsibility to provide safe working conditions and to challenge itself to continually improve in all respects of health and safety, promoting a culture of safety and wellness for all employees and partners. We believe that protecting the health and safety of our employees, partners, and customers is always good business'. [Global Occupational Health and Safety Statement, N/A: investors.footlocker-inc.com] Not Met: Commitment to ILO working hours standards or 48 hour regular work week: The Code of Business Conduct indicates: 'We fully respect all applicable laws that set a minimum wage, break periods, and maximum hours for employment'. 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. [Code of Business Conduct, N/A: investors.footlocker-inc.com] <p>Score 2</p> <ul style="list-style-type: none"> Met: Expects suppliers to commit to H&S of workers: The Global Sourcing Guidelines indicates: 'Foot Locker will only deal with suppliers who provide their workers with a safe and healthy work environment designed to prevent accidents and injury to health arising out of, or occurring in the course of, work. Foot Locker's suppliers must comply with all applicable, legally- mandated minimum standards for workplace health and safety'. [Global Sourcing Guidelines, 2022: investors.footlocker-inc.com] Not Met: Expects suppliers to commit to ILO working hours standards or 48 hour regular work week: The Global Sourcing Guidelines indicates: 'Foot Locker will only deal with suppliers who maintain reasonable work hours, not exceeding prevailing local standards or any maximum prescribed by applicable laws. Overtime work shall be consensual, and other than in extraordinary circumstances, workers must be allowed to have at least one weekly rest day, and the sum of weekly working hours, including overtime, shall not exceed 60 hours. Suppliers shall comply with applicable laws that entitle workers to paid annual leave, casual leave, and holidays'. However, no formal commitment about respecting the ILO conventions on working hours was found. Alternatively, the Company would achieve this by committing to a 48 hours regular working week, and consensual overtime paid at a premium rate. [Global Sourcing Guidelines, 2022: investors.footlocker-inc.com]
A.1.3.AP	Commitment to respect human rights particularly relevant to the sector – vulnerable groups (AP)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Not Met: Commitment to women's rights Not Met: Commitment to children's rights Not Met: Commitment to migrant worker's rights Not Met: Expects suppliers to respect these rights <p>Score 2</p> <ul style="list-style-type: none"> Not Met: Commitment refers to CEDAW/Women's Empowerment Principles Not Met: Commitment refers to Child Rights Convention/Business Principles Not Met: Commitment refers to Convention on migrant workers Not Met: Expects suppliers to respect these rights
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"> Not Met: Commitment to remedy adverse HRs impacts Not Met: Expects suppliers to make this commitment <p>Score 2</p> <ul style="list-style-type: none"> Not Met: Commitment to collaborate with judicial or non-judicial mechanisms Not Met: Commitment to work with suppliers on remedy: In the context to audit outcomes, the 2021 Impact Report indicates: 'If critical issues are identified, we

Indicator Code	Indicator name	Score (out of 2)	Explanation
			partner with the vendor to remediate the issue(s)'. However, only policy commitments are considered a suitable source for this indicator under CHRB revised approach. [Impact Report 2021, 2021: investors.footlocker-inc.com]
A.1.5	Commitment to respect the rights of human rights defenders	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Zero tolerance of threats/attacks on HRDs • Not Met: Expects suppliers to make this commitment Score 2 <ul style="list-style-type: none"> • Not Met: Commitment to working with HRDs to create safe and enabling environment

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.2.1	Commitment from the top	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Board level responsibility for HRs: The company indicates that Dona D. Young is responsible for oversight the company's human rights efforts. She is a Lead Independent Director. [2022 Proxy Statement, 2022: footlocker-inc.com] • Met: Describes HRs expertise of Board member: Dona D. Young acquired education and experience when she worked in board service at Save the Children. [2022 Proxy Statement, 2022: footlocker-inc.com] Score 2 <ul style="list-style-type: none"> • Not Met: Board member/CEO signal importance of HRs in their communications: In the 2022 Proxy Statement, there is a letter from Richard A. Johnson, Chairman and Chief Executive Officer, talking about the company's commitment to human rights. However, no statement was found that was not published as part of a company report. [2022 Proxy Statement, 2022: footlocker-inc.com]
A.2.2	Board responsibility	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Process to review HRs strategy at board level • Not Met: Example of HRs issues/trends discussed in last reporting period Score 2 <ul style="list-style-type: none"> • Not Met: Meets both requirements under score 1 • Not Met: Describes how affected stakeholders / HRs experts inform board discussions
A.2.3	Incentives and performance management	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: At least one board member incentive linked to HRs commitments • Not Met: Incentive scheme linked to key HRs risks beyond employee H&S Score 2 <ul style="list-style-type: none"> • Not Met: Performance criteria linked to HRs made public • Not Met: Review of other board incentives for coherence with HRs policies
A.2.4	Business model strategy and risks	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Board process to review business model and strategy for HRs risks • Not Met: Describes frequency and triggers for reviewing business model Score 2 <ul style="list-style-type: none"> • Not Met: Meets both requirements under score 1 • Not Met: Example of actions resulting from reviews

B. Embedding Respect and Human Rights Due Diligence (25% of Total)

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.1	Responsibility and resources for day-to-day human rights functions	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Score of 1 on A.1.2.a • Met: Senior responsibility for HRs implementation and decision making: The Company indicates that the ESG Leadership Team is responsible for the implementation of the ESG strategy. [Impact Report 2021, 2021: investors.footlocker-inc.com] Score 2 <ul style="list-style-type: none"> • Not Met: Describes day-to-day responsibility for implementing HRs commitments • Not Met: Day-to-day resources and expertise allocation in own operations • Not Met: Resources and expertise allocation in supply chain

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.2	Incentives and performance management	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Senior manager incentives linked to HRs commitments: The Company explains its NPS metric as 'an ESG metric because it measures customer satisfaction and brand perception, which are dependent on factors that include ESG.' However, it is not clear how human rights is reflected. [2022 Proxy Statement, 2022: footlocker-inc.com] • Not Met: Incentive scheme linked to key HRs risks beyond employee H&S Score 2 <ul style="list-style-type: none"> • Not Met: Performance criteria linked to HRs made public • Not Met: Review of other senior management incentives for coherence with HRs policies
B.1.3	Integration with enterprise risk management	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: HRs risks integrated as part of enterprise risk system: The Company states that 'The organizational annual enterprise risk assessment identifies ESG as an emerging risk, particularly due to shifts in customer preferences for more sustainable products and increasing requests from stakeholders for greater transparency in ESG disclosures. This risk continues to be monitored by our Board and ranked on an annual basis' [Impact Report 2021, 2021: investors.footlocker-inc.com] • Not Met: Provides an example Score 2 <ul style="list-style-type: none"> • Not Met: Risk assesment by Audit Committee or independent third party: The Company states that 'Procedures are well established for regular risk monitoring by management, quarterly risk reporting to the Audit Committee (including any ESG-related risks, if applicable)'. However, this subindicator looks for evidence of how the Company assesses the adequacy of the ERM in managing human rights risks. Assessment is either to be conducted by an external entity or supervised by the Audit Committee. [Impact Report 2021, 2021: investors.footlocker-inc.com]
B.1.4.a	Communication /dissemination of policy commitment(s) to workers and external stakeholders	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Score of 1 on A.1.2.a • Not Met: Communicates HRs policies to all workers in own operations: The Company states that the Global Human Rights Statement can be accessed through its website. Furthermore, the Company states that the Code of Business Conduct is distributed to 'out team members' annually. However, it is not clear how workers are made aware of the Human Rights Statement. It is also not clear if the Company is referring to all workers when mentioning team members. [2022 Proxy Statement, 2022: footlocker-inc.com] & [Impact Report 2021, 2021: investors.footlocker-inc.com] Score 2 <ul style="list-style-type: none"> • Not Met: Communicates HRs policies to stakeholders • Not Met: Example of how HRs policies are accessible for intended audience
B.1.4.b	Communication /dissemination of policy commitment(s) to business relationships	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Meets ILO requirement for suppliers on A.1.2.a • Not Met: Describes steps to communicate HRs policies to supply chain • Not Met: Requires suppliers to communicate HRs policies Score 2 <ul style="list-style-type: none"> • Not Met: Describes how HRs policies are contractual/binding for suppliers • Not Met: Requires suppliers to cascade contractual/binding HRs policies to its suppliers
B.1.5	Training on Human Rights	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Score of at least 1 on A.1.2.a • Not Met: Describes how workers are trained on HRs policy commitments: The company states that provides ongoing trainings throughout the year, however none of them are related to human rights. The Company further states that it provides ongoing compliance training throughout the year to its team members. However, it is not clear if the Company is referring to all workers. [Impact Report 2021, 2021: investors.footlocker-inc.com] & [Impact Report 2021, 2021: investors.footlocker-inc.com] • Not Met: Trains relevant managers including procurement on HRs Score 2 <ul style="list-style-type: none"> • Not Met: Score of 2 on A.1.2.a • Not Met: Meets both requirements under score 1 • Not Met: Trains suppliers to meet HRs commitments

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not Met: Discloses % suppliers trained
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"> • Not Met: Score of at least 1 on A.1.2.a • Not Met: Monitors implementation of HRs policy commitments across global ops and supply chain: The Company indicates it conducts audits of its private label supplier's factories. However, it is not clear how it monitors implementation of human rights policies across its own operations. [Global Human Rights Statement, N/A: investors.footlocker-inc.com] • Not Met: Discloses % of supply chain monitored: The Company states that in FY 2021 it audited 100% of its Tier 1 proprietary brand suppliers. However, no information was found on monitoring of indirect suppliers. [Impact Report 2021, 2021: investors.footlocker-inc.com] • Not Met: Describes how workers are involved in monitoring <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Score of 2 on A.1.2.a • Not Met: Describes corrective actions process • Not Met: Discloses findings and number of correction action processes
B.1.7	Engaging and terminating business relationships	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: HRs performance affects selection suppliers: The Company states 'In the selection of our suppliers, we work hard to find reputable business partners who are committed to ethical standards and business practices consistent with our values'. However, it is not clear how the Company measures the human rights performance of potential new suppliers. [Impact Report 2021, 2021: investors.footlocker-inc.com] • Met: HRs performance affects continuation supplier relationships: The company states that: 'conducts regular social compliance audits for direct suppliers of private label product on an annual basis. During the social compliance audit, a verified third party evaluates the factory on compliance in forced labor, child labor, wages and working hours, harassment and discipline, health and safety, freedom of association, discrimination, sub-contracting, and basic environmental standards. Auditors evaluate compliance with these standards through document review, worker and management interviews and factory tours. Auditors are trained in identifying potential risks of forced labor or human trafficking'. The Company further states that ' Each of our suppliers acknowledges that its failure to honor this agreement will compel us to re-evaluate, and possibly terminate, our business relationship with them.' [2022 Modern Slavery Report, 2022: footlocker-emea.com] & [Impact Report 2021, 2021: investors.footlocker-inc.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describes positive HRs incentives for business relationships • Not Met: Works with suppliers to meet HRs requirements
B.1.8	Approach to engagement with affected stakeholders	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Describes how workers and communities identified and engaged in the last two years • Not Met: Discloses stakeholders whose HRs may be affected • Not Met: Provides two examples of engagement with stakeholders <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Analysis of stakeholder views on company's HRs issues • Not Met: Describes how stakeholder views influenced company's HRs approach

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.1	Identifying human rights risks and impacts	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Describes process of identifying risks in own operations • Not Met: Describes process for identifying risks in business relationships: The Company describes its periodic auditing of its contracted factories. However, it is not clear if this includes the identification of human rights risks. [Impact Report 2021, 2021: investors.footlocker-inc.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describes global risk identification system incl. stakeholder consultation • Not Met: Describes how risk identification system is triggered by new circumstances • Not Met: Describes risks identified in relation to new circumstances

Indicator Code	Indicator name	Score (out of 2)	Explanation
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"> • Not Met: Describes assessment process and discloses salient HRs risks • Not Met: Describes how process applies to supply chain • Not Met: Public disclosure of results of HRs risk assessment: The Company indicates that the key risks in its supply chain are child labour, forced labour, unfair wages and benefits, poor working conditions, and health and safety risks, such as high temperatures in factories, extreme noise levels, and potential impacts from cleaning agents. However, no information was found of an assessment of the risks in the Company's own operations. [Impact Report 2021, 2021: investors.footlocker-inc.com] Score 2 <ul style="list-style-type: none"> • Not Met: Meets all requirements under score 1 • Not Met: Describes how assessment involved affected stakeholders
B.2.3	Integrating and acting on human rights risks and impact assessments	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Describes system to prevent, mitigate and remediate HRs issues • Not Met: Describes how global system applies to supply chain • Not Met: Example of actions decided on at least 1 salient HRs issue Score 2 <ul style="list-style-type: none"> • Not Met: Meets all requirements under score 1 • Not Met: Describes how stakeholders involved in decisions about actions taken
B.2.4	Tracking the effectiveness of actions to respond to human rights risks and impacts	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Describes system for evaluation effectiveness of actions • Not Met: Example of lessons learned from evaluation effectiveness of actions Score 2 <ul style="list-style-type: none"> • Not Met: Meets all requirements under score 1 • Not Met: Involves stakeholders in evaluation effectiveness of actions
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"> • Not Met: Provides two examples of comms with stakeholders Score 2 <ul style="list-style-type: none"> • 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	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Grievance mechanism accessible to all workers: The company states: 'we encourage employees to inform us if they experience, witness or become aware of any conduct that might constitute discrimination or harassment. We all have a responsibility to Speak Up. We have a Code of Business Conduct Hotline via telephone at 1-866-839-5112 (for the U.S. and Canada), or on the web at footlocker.ethicspoint.com (international dialling numbers can also be found here), which is managed by an independent third party and is available 24 hours a day, 7 days a week, in multiple languages' [Global Human Rights Statement, N/A: investors.footlocker-inc.com] Score 2 <ul style="list-style-type: none"> • Not Met: Grievance mechanism available in appropriate languages and workers made aware: The company states: 'we encourage employees to inform us if they experience, witness or become aware of any conduct that might constitute discrimination or harassment. We all have a responsibility to Speak Up. We have a Code of Business Conduct Hotline via telephone at 1-866-839-5112 (for the U.S. and Canada), or on the web at footlocker.ethicspoint.com (international dialling numbers can also be found here), which is managed by an independent third party and is available 24 hours a day, 7 days a week, in multiple languages'. However, it is not clear how the company ensures that workers are aware of it. [Global Human Rights Statement, N/A: investors.footlocker-inc.com] • Not Met: Describes how workers in supply chain access grievance mechanism • Not Met: Expects suppliers to convey expectation to their suppliers
C.2	Grievance mechanism(s) for external	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Grievance mechanism accessible to all external individuals and communities

Indicator Code	Indicator name	Score (out of 2)	Explanation
	individuals and communities		Score 2 <ul style="list-style-type: none"> • Not Met: Grievance mechanism available in appropriate languages and affected stakeholders made aware • Not Met: Describes how external individuals/communities access grievance mechanism • 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 <ul style="list-style-type: none"> • 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 <ul style="list-style-type: none"> • 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 <ul style="list-style-type: none"> • Not Met: Describes procedure and timescales for managing complaints or concerns • Not Met: Describes technical, financial, advisory support to enable equal access Score 2 <ul style="list-style-type: none"> • Not Met: Describe types of outcome to complainant through use of mechanism • Not Met: Describes escalation to senior levels / independent adjudicators
C.5	Prohibition of retaliation for raising complaints or concerns	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Public statement prohibiting retaliation against workers/stakeholders: In the Global Human Rights Statement, Foot Locker states: 'There will be no retaliation for asking questions or reporting concerns in good faith. Concerns directed to the Hotline can be made anonymously, where allowed by local law'. As it is a document used to discuss global issues involving the company's human rights, the retaliation mentioned in it can be also about human rights concerns. However, it is not clear if the prohibition of retaliation applies to other stakeholders. [Global Human Rights Statement, N/A: investors.footlocker-inc.com] Score 2 <ul style="list-style-type: none"> • Not Met: Specifies no legal action, firing or violence • Not Met: Expects suppliers to prohibit retaliation against workers/stakeholders
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"> • Not Met: Complainants not asked to waive legal rights • Not Met: Does not require confidentiality provisions Score 2 <ul style="list-style-type: none"> • Not Met: Cooperates with state based non judicial mechanisms • Not Met: Example of issue resolved (if applicable)
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"> • Not Met: Describes approach taken to remedy adverse HRs impacts • Not Met: Describes how remedy would be provided if no adverse impact identified Score 2 <ul style="list-style-type: none"> • Not Met: Describes changes to systems, processes and practices to prevent future impacts • Not Met: Describes approach to monitoring/implementing agreed remedy • Not Met: Describes approach to learning from incidents if no adverse impacts identified
C.8	Communication on the effectiveness of grievance mechanism(s) and incorporating lessons learned	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Discloses number of grievances filed, addressed or resolved and outcomes achieved • Not Met: Example of how lessons from mechanism improved HRs management system Score 2 <ul style="list-style-type: none"> • Not Met: Describes process to evaluate mechanism and changes made as a result • Not Met: Describes procedures to address delays of outcomes agreed with stakeholders

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.2.1.a	Living wage (in own production or manufacturing operations)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Pays living wage or sets time-bound target • Not Met: Describes how living wage determined Score 2 <ul style="list-style-type: none"> • Not Met: Achieved paying a living wage • Not Met: Reviews definition living wage with unions
D.2.1.b	Living wage (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"> • Not Met: Requirements on living wage in supplier codes and contracts • Not Met: Describes work with suppliers on living wage Score 2 <ul style="list-style-type: none"> • Not Met: Assessment of scope of payment below living wage in supply chain • Not Met: Analysis of trends demonstrating progress
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"> • Not Met: Describes practices to avoid price or short notice requirements that undermine HRs • Not Met: Describes practices to pay suppliers in line with agreed timeframes • Not Met: Reviews own operations to mitigate negative impact of purchasing practices Score 2 <ul style="list-style-type: none"> • Not Met: Meets all requirements under score 1 • Not Met: Example of assessing and changing of purchasing practices
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"> • Not Met: Identifies direct and indirect suppliers including manufacturing sites Score 2 <ul style="list-style-type: none"> • Not Met: Discloses names and locations of significant parts of supply chain and how significance was defined • Not Met: Discloses direct or indirect suppliers involved in higher-risk activities
D.2.4.a	Prohibition of child labour: Age verification and corrective actions (in own production or manufacturing operations)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Indicates it does not use child labour • Not Met: Age verification of recruited workers Score 2 <ul style="list-style-type: none"> • Not Met: Remediation if child labour found in operations
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"> • Not Met: Requirements on child labour in supplier codes and contracts: The Company states that 'Child labor is not permissible. Workers may not be younger than 15 years of age (or 14 where local law permits) or the age for completing compulsory education, if higher.' However, no information was found regarding verifying the age of workers recruited or remediation programmes. [Global Sourcing Guidelines, 2022: investors.footlocker-inc.com] Score 2 <ul style="list-style-type: none"> • Not Met: Describes work with suppliers on eliminating child labour • Not Met: Assessment of scope of child labour in supply chain • Not Met: Analysis of trends demonstrating progress
D.2.5.a	Prohibition of forced labour: Recruitment fees and costs (in own production or manufacturing operations)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Job seekers/workers do not pay recruitment fee • Not Met: Commitment to fully reimburse recruitment fees paid Score 2 <ul style="list-style-type: none"> • Not Met: Describes implementation and monitoring in own operations, incl. service providers
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"> • Not Met: Requirements on debt/fees in supplier codes and contracts • Not Met: Describes work with suppliers on debt/fees for job seekers/workers Score 2 <ul style="list-style-type: none"> • Not Met: Assessment scope of payment of recruitment fees in supply chain • Not Met: Analysis of trends demonstrating progress

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.2.5.c	Prohibition of forced labour: Wage practices (in own production or manufacturing operations)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Pays workers regularly, in full and on time • Not Met: Payslip workers shows wages and legitimate deductions Score 2 <ul style="list-style-type: none"> • Not Met: Describes implementation and monitoring in own operations, incl. service providers
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"> • Not Met: Requirements on paying in full and on time in supplier codes and contracts: The Company states 'Foot Locker will only deal with suppliers who compensate their workers fairly and timely by providing wages'. However, no information was found on requirements to pay workers in full. [Global Sourcing Guidelines, 2022: investors.footlocker-inc.com] • Not Met: Describes work with suppliers on paying workers regularly, in full and on time Score 2 <ul style="list-style-type: none"> • Not Met: Assessment scope of failure to pay workers in full and on time in supply chain • Not Met: Analysis of trends demonstrating progress
D.2.5.e	Prohibition of forced labour: Restrictions on workers (in own production or manufacturing operations)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Does not retain documents or restrict movement of workers Score 2 <ul style="list-style-type: none"> • Not Met: Describes implementation and monitoring in own operations, incl. service providers
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"> • Not Met: Requirements on free movement in supplier codes and contracts • Not Met: Describes working with suppliers on free movement of workers Score 2 <ul style="list-style-type: none"> • Not Met: Assessment of scope of restriction of movement in supply chain • Not Met: Analysis of trends demonstrating progress
D.2.6.a	Freedom of association and collective bargaining (in own production or manufacturing operations)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Commits to measures prohibiting interference with trade unions • Not Met: Discloses % total workforce covered by CB agreements Score 2 <ul style="list-style-type: none"> • Not Met: Meets both requirements under score 1
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"> • Not Met: Requirements on FoA/CB in suppliers codes and contracts: The Company states that 'Suppliers must respect the right to free association and grant their workers the right to bargain collectively without unlawful interference'. However, it is not clear if this applies in all circumstances. [Global Sourcing Guidelines, 2022: investors.footlocker-inc.com] • Not Met: Describes work with suppliers on FoA/CB Score 2 <ul style="list-style-type: none"> • Not Met: Assessment of scope of restriction of FoA/CB in supply chain • Not Met: Analysis of trends demonstrating progress
D.2.7.a	Health and safety: Fatalities, lost days, injury, occupational disease rates (in own production of manufacturing operations)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Describes process to identify H&S risks and impacts: The Company states: 'The Company is committed to maintaining a healthy and safe work environment for all of its employees around the world. In furtherance of this commitment, the Company is dedicated to: [...] strive to set higher standards for the Company and its partners by identifying best practices and unacceptable risks'. However, no description of the process used to identify health and safety risks was found. [Global Occupational Health and Safety Statement, N/A: investors.footlocker-inc.com] • Not Met: Discloses injury rate or lost days for own workers in last reporting period

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not Met: Discloses fatalities for own workers in last reporting period • Not Met: Discloses occupational disease rate for own workers in last reporting period Score 2 <ul style="list-style-type: none"> • Not Met: Sets targets for H&S performance • Not Met: Met targets or explains why not or how improve H&S management systems
D.2.7.b	Health and safety: Fatalities, lost days, injury, occupational disease rates (in the supply chain)	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Requirements on H&S in supplier codes and contracts: The Company states that 'Foot Locker will only deal with suppliers who provide their workers with a safe and healthy work environment designed to prevent accidents and injury to health arising out of, or occurring in the course of, work. Foot Locker's suppliers must comply with all applicable, legally- mandated minimum standards for workplace health and safety.' [Global Sourcing Guidelines, 2022: investors.footlocker-inc.com] <ul style="list-style-type: none"> • Not Met: Discloses injury rate or lost days in supply chain in last reporting period • Not Met: Discloses fatalities for workers in supply chain in last reporting period • Not Met: Discloses occupational disease rate in supply chain in last reporting period Score 2 <ul style="list-style-type: none"> • Not Met: Describes work with suppliers of H&S • Not Met: Assessment of scope of H&S issues in supply chain • Not Met: Analysis of trends demonstrating progress
D.2.8.a	Women's rights (in own production or manufacturing operations)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Describes processes to stop harassment and violence against women • Not Met: Working conditions take into account gender issues • Not Met: Measures and steps to address gender pay gap at all levels of employment Score 2 <ul style="list-style-type: none"> • Not Met: Meets all requirements under score 1 • Not Met: Analysis of trends demonstrating progress closing gender pay gap
D.2.8.b	Women's rights (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Requirements on women's rights in contracts/codes with suppliers: The Company states that 'Foot Locker will not deal with suppliers whose workers are subjected to corporal punishment or mental or physical coercion and/or physical, sexual, psychological, or verbal harassment or abuse.' However, no specific mention of women's rights was found. [Global Sourcing Guidelines, 2022: investors.footlocker-inc.com] <ul style="list-style-type: none"> • Not Met: Describes work with suppliers on women's rights Score 2 <ul style="list-style-type: none"> • Not Met: Assessment of scope of unsafe working conditions/discrimination against women in supply chain • Not Met: Analysis of trends demonstrating progress
D.2.9.a	Working hours (in own production or manufacturing operations)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Respects HRs regarding working hours/breaks/rest • Not Met: Assesses ability of workers to comply with working hours commitments when allocating work Score 2 <ul style="list-style-type: none"> • Not Met: Describes implementation and monitoring in own operations
D.2.9.b	Working hours (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Requirements on working hours in codes/contracts with suppliers: The Company states 'Foot Locker will only deal with suppliers who maintain reasonable work hours, not exceeding prevailing local standards or any maximum prescribed by applicable laws. Overtime work shall be consensual, and other than in extraordinary circumstances, workers must be allowed to have at least one weekly rest day, and the sum of weekly working hours, including overtime, shall not exceed 60 hours. Suppliers shall comply with applicable laws that entitle workers to paid annual leave, casual leave, and holidays.' However, this requirement is not in line with international standards. [Global Sourcing Guidelines, 2022: investors.footlocker-inc.com] <ul style="list-style-type: none"> • Not Met: Describes work with suppliers on working hours Score 2 <ul style="list-style-type: none"> • Not Met: Assessment of scope of excessive working hours in supply chain

Indicator Code	Indicator name	Score (out of 2)	Explanation
			• Not Met: Analysis of trends demonstrating progress

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
E(1).0	Serious allegation No 1		No allegations meeting the CHRB severity threshold were found, and so the score of 3.82 out of 80 points scored in themes A-D has been applied to produce a score of 0.95 out of 20 points for theme E.

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