

**Corporate Human Rights Benchmark  
2023 Company Scorecard**

**Company name** Heilan Group  
**Sector** Apparel (supply chain only)  
**Overall score** 0.0 out of 100

Theme score	Out of	For theme
0.0	10	A. Governance and Policy Commitments
0.0	25	B. Embedding Respect and Human Rights Due Diligence
0.0	20	C. Remedies and Grievance Mechanisms
0.0	25	D. Performance: Company Human Rights Practices
0.0	20	E. Performance: Responses to Serious Allegations

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

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

**Detailed assessment**

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

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1.1	Commitment to respect human rights	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: General HRs commitment</li> <li>• Not Met: Universal Declaration of Human rights (UDHR)</li> <li>• Not Met: International Bill of Human Rights</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	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Commitment to ILO core principles</li> <li>• Not Met: Explicitly lists all four ILO core principles</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Expects suppliers to commit to ILO core principles</li> <li>• Not Met: Explicitly lists all four ILO core principles for suppliers</li> </ul>
A.1.2.b	Commitment to respect the human rights of workers: Health and safety and working hours	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Commitment to respect H&amp;S of workers</li> <li>• Not Met: Commitment to ILO working hours standards or 48 hour regular work week</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Expects suppliers to commit to H&amp;S of workers</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Not Met: Expects suppliers to commit to ILO working hours standards or 48 hour regular work week</li> </ul>
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"> <li>• Not Met: Commitment to women's rights</li> <li>• Not Met: Commitment to children's rights</li> <li>• Not Met: Commitment to migrant worker's rights</li> <li>• Not Met: Expects suppliers to respect these rights</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Commitment refers to CEDAW/Women's Empowerment Principles</li> <li>• Not Met: Commitment refers to Child Rights Convention/Business Principles</li> <li>• Not Met: Commitment refers to Convention on migrant workers</li> <li>• Not Met: Expects suppliers to respect these rights</li> </ul>
A.1.4	Commitment to remedy	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Commitment to remedy adverse HRs impacts</li> <li>• Not Met: Expects suppliers to make this commitment</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Commitment to collaborate with judicial or non-judicial mechanisms</li> <li>• Not Met: Commitment to work with suppliers on remedy</li> </ul>
A.1.5	Commitment to respect the rights of human rights defenders	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Zero tolerance of threats/attacks on HRDs</li> <li>• Not Met: Expects suppliers to make this commitment</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Commitment to working with HRDs to create safe and enabling environment</li> </ul>

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.2.1	Commitment from the top	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Board level responsibility for HRs</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>• Not Met: Score of 1 on A.1.2.a [website, 04/02/2023: <a href="http://heilan.com.cn">heilan.com.cn</a>]</li> <li>• Not Met: Senior responsibility for HRs implementation and decision making [website, 04/02/2023: <a href="http://heilan.com.cn">heilan.com.cn</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 [website, 04/02/2023: <a href="http://heilan.com.cn">heilan.com.cn</a>]</li> <li>• Not Met: Day-to-day resources and expertise allocation in own operations [website, 04/02/2023: <a href="http://heilan.com.cn">heilan.com.cn</a>]</li> <li>• Not Met: Resources and expertise allocation in supply chain [website, 04/02/2023: <a href="http://heilan.com.cn">heilan.com.cn</a>]</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 [website, 04/02/2023: <a href="http://heilan.com.cn">heilan.com.cn</a>]</li> <li>• Not Met: Incentive scheme linked to key HRs risks beyond employee H&amp;S [website, 04/02/2023: <a href="http://heilan.com.cn">heilan.com.cn</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Performance criteria linked to HRs made public [website, 04/02/2023: <a href="http://heilan.com.cn">heilan.com.cn</a>]</li> <li>• Not Met: Review of other senior management incentives for coherence with HRs policies [website, 04/02/2023: <a href="http://heilan.com.cn">heilan.com.cn</a>]</li> </ul>
B.1.3	Integration with enterprise risk management	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: HRs risks integrated as part of enterprise risk system [website, 04/02/2023: <a href="http://heilan.com.cn">heilan.com.cn</a>]</li> <li>• Not Met: Provides an example [website, 04/02/2023: <a href="http://heilan.com.cn">heilan.com.cn</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Risk assesment by Audit Committee or independent third party [website, 04/02/2023: <a href="http://heilan.com.cn">heilan.com.cn</a>]</li> </ul>
B.1.4.a	Communication /dissemination of policy commitment(s) to workers and external stakeholders	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Score of 1 on A.1.2.a [website, 04/02/2023: <a href="http://heilan.com.cn">heilan.com.cn</a>]</li> <li>• Not Met: Communicates HRs policies to all workers in own operations [website, 04/02/2023: <a href="http://heilan.com.cn">heilan.com.cn</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Communicates HRs policies to stakeholders [website, 04/02/2023: <a href="http://heilan.com.cn">heilan.com.cn</a>]</li> <li>• Not Met: Example of how HRs policies are accessible for intended audience [website, 04/02/2023: <a href="http://heilan.com.cn">heilan.com.cn</a>]</li> </ul>
B.1.4.b	Communication /dissemination of policy commitment(s) to business relationships	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Meets ILO requirement for suppliers on A.1.2.a [website, 04/02/2023: <a href="http://heilan.com.cn">heilan.com.cn</a>]</li> <li>• Not Met: Describes steps to communicate HRs policies to supply chain [website, 04/02/2023: <a href="http://heilan.com.cn">heilan.com.cn</a>]</li> <li>• Not Met: Requires suppliers to communicate HRs policies [website, 04/02/2023: <a href="http://heilan.com.cn">heilan.com.cn</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Describes how HRs policies are contractual/binding for suppliers [website, 04/02/2023: <a href="http://heilan.com.cn">heilan.com.cn</a>]</li> <li>• Not Met: Requires suppliers to cascade contractual/binding HRs policies to its suppliers [website, 04/02/2023: <a href="http://heilan.com.cn">heilan.com.cn</a>]</li> </ul>
B.1.5	Training on Human Rights	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Score of at least 1 on A.1.2.a [website, 04/02/2023: <a href="http://heilan.com.cn">heilan.com.cn</a>]</li> <li>• Not Met: Describes how workers are trained on HRs policy commitments [website, 04/02/2023: <a href="http://heilan.com.cn">heilan.com.cn</a>]</li> <li>• Not Met: Trains relevant managers including procurement on HRs [website, 04/02/2023: <a href="http://heilan.com.cn">heilan.com.cn</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Score of 2 on A.1.2.a [website, 04/02/2023: <a href="http://heilan.com.cn">heilan.com.cn</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Not Met: Meets both requirements under score 1 [website, 04/02/2023: <a href="http://heilan.com.cn">heilan.com.cn</a>]</li> <li>• Not Met: Trains suppliers to meet HRs commitments [website, 04/02/2023: <a href="http://heilan.com.cn">heilan.com.cn</a>]</li> <li>• Not Met: Discloses % suppliers trained [website, 04/02/2023: <a href="http://heilan.com.cn">heilan.com.cn</a>]</li> </ul>
B.1.6	Monitoring and corrective actions	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Score of at least 1 on A.1.2.a [website, 04/02/2023: <a href="http://heilan.com.cn">heilan.com.cn</a>]</li> <li>• Not Met: Monitors implementation of HRs policy commitments across global ops and supply chain [website, 04/02/2023: <a href="http://heilan.com.cn">heilan.com.cn</a>]</li> <li>• Not Met: Discloses % of supply chain monitored [website, 04/02/2023: <a href="http://heilan.com.cn">heilan.com.cn</a>]</li> <li>• Not Met: Describes how workers are involved in monitoring [website, 04/02/2023: <a href="http://heilan.com.cn">heilan.com.cn</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Score of 2 on A.1.2.a [website, 04/02/2023: <a href="http://heilan.com.cn">heilan.com.cn</a>]</li> <li>• Not Met: Describes corrective actions process [website, 04/02/2023: <a href="http://heilan.com.cn">heilan.com.cn</a>]</li> <li>• Not Met: Discloses findings and number of correction action processes [website, 04/02/2023: <a href="http://heilan.com.cn">heilan.com.cn</a>]</li> </ul>
B.1.7	Engaging and terminating business relationships	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: HRs performance affects selection suppliers [website, 04/02/2023: <a href="http://heilan.com.cn">heilan.com.cn</a>]</li> <li>• Not Met: HRs performance affects continuation supplier relationships [website, 04/02/2023: <a href="http://heilan.com.cn">heilan.com.cn</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Describes positive HRs incentives for business relationships [website, 04/02/2023: <a href="http://heilan.com.cn">heilan.com.cn</a>]</li> <li>• Not Met: Works with suppliers to meet HRs requirements [website, 04/02/2023: <a href="http://heilan.com.cn">heilan.com.cn</a>]</li> </ul>
B.1.8	Approach to engagement with affected stakeholders	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Describes how workers and communities identified and engaged in the last two years [website, 04/02/2023: <a href="http://heilan.com.cn">heilan.com.cn</a>]</li> <li>• Not Met: Discloses stakeholders whose HRs may be affected [website, 04/02/2023: <a href="http://heilan.com.cn">heilan.com.cn</a>]</li> <li>• Not Met: Provides two examples of engagement with stakeholders [website, 04/02/2023: <a href="http://heilan.com.cn">heilan.com.cn</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Analysis of stakeholder views on company's HRs issues [website, 04/02/2023: <a href="http://heilan.com.cn">heilan.com.cn</a>]</li> <li>• Not Met: Describes how stakeholders views influenced company's HRs approach [website, 04/02/2023: <a href="http://heilan.com.cn">heilan.com.cn</a>]</li> </ul>

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.1	Identifying human rights risks and impacts	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Describes process of identifying risks in own operations [website, 04/02/2023: <a href="http://heilan.com.cn">heilan.com.cn</a>]</li> <li>• Not Met: Describes process for identifying risks in business relationships [website, 04/02/2023: <a href="http://heilan.com.cn">heilan.com.cn</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Describes global risk identification system incl. stakeholder consultation [website, 04/02/2023: <a href="http://heilan.com.cn">heilan.com.cn</a>]</li> <li>• Not Met: Describes how risk identification system is triggered by new circumstances [website, 04/02/2023: <a href="http://heilan.com.cn">heilan.com.cn</a>]</li> <li>• Not Met: Describes risks identified in relation to new circumstances [website, 04/02/2023: <a href="http://heilan.com.cn">heilan.com.cn</a>]</li> </ul>
B.2.2	Assessing human rights risks and impacts	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Describes assessment process and discloses salient HRs risks [website, 04/02/2023: <a href="http://heilan.com.cn">heilan.com.cn</a>]</li> <li>• Not Met: Describes how process applies to supply chain [website, 04/02/2023: <a href="http://heilan.com.cn">heilan.com.cn</a>]</li> <li>• Not Met: Public disclosure of results of HRs risk assessment [website, 04/02/2023: <a href="http://heilan.com.cn">heilan.com.cn</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			Score 2 <ul style="list-style-type: none"> <li>• Not Met: Meets all requirements under score 1 [website, 04/02/2023: <a href="http://heilan.com.cn">heilan.com.cn</a>]</li> <li>• Not Met: Describes how assessment involved affected stakeholders [website, 04/02/2023: <a href="http://heilan.com.cn">heilan.com.cn</a>]</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 [website, 04/02/2023: <a href="http://heilan.com.cn">heilan.com.cn</a>]</li> <li>• Not Met: Describes how global system applies to supply chain [website, 04/02/2023: <a href="http://heilan.com.cn">heilan.com.cn</a>]</li> <li>• Not Met: Example of actions decided on at least 1 salient HRs issue [website, 04/02/2023: <a href="http://heilan.com.cn">heilan.com.cn</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Meets all requirements under score 1 [website, 04/02/2023: <a href="http://heilan.com.cn">heilan.com.cn</a>]</li> <li>• Not Met: Describes how stakeholders involved in decisions about actions taken [website, 04/02/2023: <a href="http://heilan.com.cn">heilan.com.cn</a>]</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 [website, 04/02/2023: <a href="http://heilan.com.cn">heilan.com.cn</a>]</li> <li>• Not Met: Example of lessons learned from evaluation effectiveness of actions [website, 04/02/2023: <a href="http://heilan.com.cn">heilan.com.cn</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Meets all requirements under score 1 [website, 04/02/2023: <a href="http://heilan.com.cn">heilan.com.cn</a>]</li> <li>• Not Met: Involves stakeholders in evaluation effectiveness of actions [website, 04/02/2023: <a href="http://heilan.com.cn">heilan.com.cn</a>]</li> </ul>
B.2.5	Communicating on human rights impacts	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Provides two examples of comms with stakeholders [website, 04/02/2023: <a href="http://heilan.com.cn">heilan.com.cn</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Describes challenges to effective comms and how it is working to address them [website, 04/02/2023: <a href="http://heilan.com.cn">heilan.com.cn</a>]</li> </ul>

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.1	Grievance mechanism(s) for workers	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Grievance mechanism accessible to all workers</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Grievance mechanism available in appropriate languages and workers made aware</li> <li>• Not Met: Describes how workers in supply chain access grievance mechanism</li> <li>• Not Met: Expects suppliers to convey expectation to their suppliers</li> </ul>
C.2	Grievance mechanism(s) for external individuals and communities	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Grievance mechanism accessible to all external individuals and communities [website, 04/02/2023: <a href="http://heilan.com.cn">heilan.com.cn</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Grievance mechanism available in appropriate languages and affected stakeholders made aware [website, 04/02/2023: <a href="http://heilan.com.cn">heilan.com.cn</a>]</li> <li>• Not Met: Describes how external individuals/communities access grievance mechanism [website, 04/02/2023: <a href="http://heilan.com.cn">heilan.com.cn</a>]</li> <li>• Not Met: Expects supplier to convey expectation to their suppliers [website, 04/02/2023: <a href="http://heilan.com.cn">heilan.com.cn</a>]</li> </ul>
C.3	Users are involved in the design and performance of the mechanism(s)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Describes how users engaged on design and performance [website, 04/02/2023: <a href="http://heilan.com.cn">heilan.com.cn</a>]</li> <li>• Not Met: Provides user engagement examples (at least two) on design and performance [website, 04/02/2023: <a href="http://heilan.com.cn">heilan.com.cn</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Describes how users engaged on improvement of mechanism [website, 04/02/2023: <a href="http://heilan.com.cn">heilan.com.cn</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Not Met: Provides user engagement examples (at least two) on improvement [website, 04/02/2023: <a href="http://heilan.com.cn">heilan.com.cn</a>]</li> </ul>
C.4	Procedures related to the mechanism(s) are equitable, publicly available and explained	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Describes procedure and timescales for managing complaints or concerns [website, 04/02/2023: <a href="http://heilan.com.cn">heilan.com.cn</a>]</li> <li>• Not Met: Describes technical, financial, advisory support to enable equal access [website, 04/02/2023: <a href="http://heilan.com.cn">heilan.com.cn</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Describe types of outcome to complainant through use of mechanism [website, 04/02/2023: <a href="http://heilan.com.cn">heilan.com.cn</a>]</li> <li>• Not Met: Describes escalation to senior levels / independent adjudicators [website, 04/02/2023: <a href="http://heilan.com.cn">heilan.com.cn</a>]</li> </ul>
C.5	Prohibition of retaliation for raising complaints or concerns	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: Public statement prohibiting retaliation against workers/stakeholders [website, 04/02/2023: <a href="http://heilan.com.cn">heilan.com.cn</a>]</li> <li>• Not Met: Describes practical measures to prevent retaliation [website, 04/02/2023: <a href="http://heilan.com.cn">heilan.com.cn</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Specifies no legal action, firing or violence [website, 04/02/2023: <a href="http://heilan.com.cn">heilan.com.cn</a>]</li> <li>• Not Met: Expects suppliers to prohibit retaliation against workers/stakeholders [website, 04/02/2023: <a href="http://heilan.com.cn">heilan.com.cn</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 [website, 04/02/2023: <a href="http://heilan.com.cn">heilan.com.cn</a>]</li> <li>• Not Met: Does not require confidentiality provisions [website, 04/02/2023: <a href="http://heilan.com.cn">heilan.com.cn</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Cooperates with state based non judicial mechanisms [website, 04/02/2023: <a href="http://heilan.com.cn">heilan.com.cn</a>]</li> <li>• Not Met: Example of issue resolved (if applicable) [website, 04/02/2023: <a href="http://heilan.com.cn">heilan.com.cn</a>]</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 [website, 04/02/2023: <a href="http://heilan.com.cn">heilan.com.cn</a>]</li> <li>• Not Met: Describes how remedy would be provided if no adverse impact identified [website, 04/02/2023: <a href="http://heilan.com.cn">heilan.com.cn</a>]</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 [website, 04/02/2023: <a href="http://heilan.com.cn">heilan.com.cn</a>]</li> <li>• Not Met: Describes approach to monitoring/implementing agreed remedy [website, 04/02/2023: <a href="http://heilan.com.cn">heilan.com.cn</a>]</li> <li>• Not Met: Describes approach to learning from incidents if no adverse impacts identified [website, 04/02/2023: <a href="http://heilan.com.cn">heilan.com.cn</a>]</li> </ul>
C.8	Communication on the effectiveness of grievance mechanism(s) and incorporating lessons learned	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Discloses number of grievances filed, addressed or resolved and outcomes achieved [website, 04/02/2023: <a href="http://heilan.com.cn">heilan.com.cn</a>]</li> <li>• Not Met: Example of how lessons from mechanism improved HRs management system [website, 04/02/2023: <a href="http://heilan.com.cn">heilan.com.cn</a>]</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 [website, 04/02/2023: <a href="http://heilan.com.cn">heilan.com.cn</a>]</li> <li>• Not Met: Describes procedures to address delays of outcomes agreed with stakeholders [website, 04/02/2023: <a href="http://heilan.com.cn">heilan.com.cn</a>]</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 [website, 04/02/2023: <a href="http://heilan.com.cn">heilan.com.cn</a>]</li> <li>• Not Met: Describes work with suppliers on living wage [website, 04/02/2023: <a href="http://heilan.com.cn">heilan.com.cn</a>]</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 payment below living wage in supply chain [website, 04/02/2023: <a href="http://heilan.com.cn">heilan.com.cn</a>]</li> <li>• Not Met: Analysis of trends demonstrating progress [website, 04/02/2023: <a href="http://heilan.com.cn">heilan.com.cn</a>]</li> </ul>
D.2.2	Aligning purchasing decisions with human rights	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Describes practices to avoid price or short notice requirements that undermine HRs [website, 04/02/2023: <a href="http://heilan.com.cn">heilan.com.cn</a>]</li> <li>• Not Met: Describes practices to pay suppliers in line with agreed timeframes [website, 04/02/2023: <a href="http://heilan.com.cn">heilan.com.cn</a>]</li> <li>• Not Met: Reviews own operations to mitigate negative impact of purchasing practices [website, 04/02/2023: <a href="http://heilan.com.cn">heilan.com.cn</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Meets all requirements under score 1 [website, 04/02/2023: <a href="http://heilan.com.cn">heilan.com.cn</a>]</li> <li>• Not Met: Example of assessing and changing of purchasing practices [website, 04/02/2023: <a href="http://heilan.com.cn">heilan.com.cn</a>]</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 [website, 04/02/2023: <a href="http://heilan.com.cn">heilan.com.cn</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Discloses names and locations of significant parts of supply chain and how significance was defined [website, 04/02/2023: <a href="http://heilan.com.cn">heilan.com.cn</a>]</li> <li>• Not Met: Discloses direct or indirect suppliers involved in higher-risk activities [website, 04/02/2023: <a href="http://heilan.com.cn">heilan.com.cn</a>]</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 [website, 04/02/2023: <a href="http://heilan.com.cn">heilan.com.cn</a>]</li> <li>• Not Met: Describes work with suppliers on eliminating child labour [website, 04/02/2023: <a href="http://heilan.com.cn">heilan.com.cn</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Assessment of scope of child labour in supply chain [website, 04/02/2023: <a href="http://heilan.com.cn">heilan.com.cn</a>]</li> <li>• Not Met: Analysis of trends demonstrating progress [website, 04/02/2023: <a href="http://heilan.com.cn">heilan.com.cn</a>]</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 [website, 04/02/2023: <a href="http://heilan.com.cn">heilan.com.cn</a>]</li> <li>• Not Met: Describes work with suppliers on debt/fees for job seekers/workers [website, 04/02/2023: <a href="http://heilan.com.cn">heilan.com.cn</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Assessment scope of payment of recruitment fees in supply chain [website, 04/02/2023: <a href="http://heilan.com.cn">heilan.com.cn</a>]</li> <li>• Not Met: Analysis of trends demonstrating progress [website, 04/02/2023: <a href="http://heilan.com.cn">heilan.com.cn</a>]</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 [website, 04/02/2023: <a href="http://heilan.com.cn">heilan.com.cn</a>]</li> <li>• Not Met: Describes work with suppliers on paying workers regularly, in full and on time [website, 04/02/2023: <a href="http://heilan.com.cn">heilan.com.cn</a>]</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 [website, 04/02/2023: <a href="http://heilan.com.cn">heilan.com.cn</a>]</li> <li>• Not Met: Analysis of trends demonstrating progress [website, 04/02/2023: <a href="http://heilan.com.cn">heilan.com.cn</a>]</li> </ul>
D.2.5.f	Prohibition of forced labour: Restrictions on workers (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Requirements on free movement in supplier codes and contracts [website, 04/02/2023: <a href="http://heilan.com.cn">heilan.com.cn</a>]</li> <li>• Not Met: Describes working with suppliers on free movement of workers [website, 04/02/2023: <a href="http://heilan.com.cn">heilan.com.cn</a>]</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 restriction of movement in supply chain [website, 04/02/2023: <a href="http://heilan.com.cn">heilan.com.cn</a>]</li> <li>• Not Met: Analysis of trends demonstrating progress [website, 04/02/2023: <a href="http://heilan.com.cn">heilan.com.cn</a>]</li> </ul>
D.2.6.b	Freedom of association and collective bargaining (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Requirements on FoA/CB in suppliers codes and contracts [website, 04/02/2023: <a href="http://heilan.com.cn">heilan.com.cn</a>]</li> <li>• Not Met: Describes work with suppliers on FoA/CB [website, 04/02/2023: <a href="http://heilan.com.cn">heilan.com.cn</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Assessment of scope of restriction of FoA/CB in supply chain [website, 04/02/2023: <a href="http://heilan.com.cn">heilan.com.cn</a>]</li> <li>• Not Met: Analysis of trends demonstrating progress [website, 04/02/2023: <a href="http://heilan.com.cn">heilan.com.cn</a>]</li> </ul>
D.2.7.b	Health and safety: Fatalities, lost days, injury, occupational disease rates (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Requirements on H&amp;S in supplier codes and contracts [website, 04/02/2023: <a href="http://heilan.com.cn">heilan.com.cn</a>]</li> <li>• Not Met: Discloses injury rate or lost days in supply chain in last reporting period [website, 04/02/2023: <a href="http://heilan.com.cn">heilan.com.cn</a>]</li> <li>• Not Met: Discloses fatalities for workers in supply chain in last reporting period [website, 04/02/2023: <a href="http://heilan.com.cn">heilan.com.cn</a>]</li> <li>• Not Met: Discloses occupational disease rate in supply chain in last reporting period [website, 04/02/2023: <a href="http://heilan.com.cn">heilan.com.cn</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Describes work with suppliers of H&amp;S [website, 04/02/2023: <a href="http://heilan.com.cn">heilan.com.cn</a>]</li> <li>• Not Met: Assessment of scope of H&amp;S issues in supply chain [website, 04/02/2023: <a href="http://heilan.com.cn">heilan.com.cn</a>]</li> <li>• Not Met: Analysis of trends demonstrating progress [website, 04/02/2023: <a href="http://heilan.com.cn">heilan.com.cn</a>]</li> </ul>
D.2.8.b	Women's rights (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Requirements on women's rights in contracts/codes with suppliers [website, 04/02/2023: <a href="http://heilan.com.cn">heilan.com.cn</a>]</li> <li>• Not Met: Describes work with suppliers on women's rights [website, 04/02/2023: <a href="http://heilan.com.cn">heilan.com.cn</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Assessment of scope of unsafe working conditions/discrimination against women in supply chain [website, 04/02/2023: <a href="http://heilan.com.cn">heilan.com.cn</a>]</li> <li>• Not Met: Analysis of trends demonstrating progress [website, 04/02/2023: <a href="http://heilan.com.cn">heilan.com.cn</a>]</li> </ul>
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"> <li>• Not Met: Requirements on working hours in codes/contracts with suppliers [website, 04/02/2023: <a href="http://heilan.com.cn">heilan.com.cn</a>]</li> <li>• Not Met: Describes work with suppliers on working hours [website, 04/02/2023: <a href="http://heilan.com.cn">heilan.com.cn</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Assessment of scope of excessive working hours in supply chain [website, 04/02/2023: <a href="http://heilan.com.cn">heilan.com.cn</a>]</li> <li>• Not Met: Analysis of trends demonstrating progress [website, 04/02/2023: <a href="http://heilan.com.cn">heilan.com.cn</a>]</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 0.00 out of 80 points scored in themes A-D has been applied to produce a score of 0.00 out of 20 points for theme E.

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