

**Corporate Human Rights Benchmark
2023 Company Scorecard**

Company name Macy's
Sector Apparel (supply chain only)
Overall score 13.1 out of 100

Theme score	Out of	For theme
3.3	10	A. Governance and Policy Commitments
4.1	25	B. Embedding Respect and Human Rights Due Diligence
1.5	20	C. Remedies and Grievance Mechanisms
1.6	25	D. Performance: Company Human Rights Practices
2.6	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	2	The individual elements of the assessment are met or not as follows: Score 1 • Met: General HRs commitment: The Human Rights Policy indicates: 'Macy's, Inc. is committed to respecting international human rights throughout its operations'. [Human Rights Policy, N/A: s202.q4cdn.com] Score 2 • Met: Commitment to UNGPs: The Human Rights Policy indicates: 'we manage our business in line with the UN Guiding Principles on Business and Human Rights'. The Human Rights Statement indicates: 'Our commitment to respect human rights is detailed in our Human Rights Policy, which is aligned to the [...] OECD Guidelines for Multinational Enterprises'. [Human Rights Policy, N/A: s202.q4cdn.com]
A.1.2.a	Commitment to respect the human rights of workers: ILO Declaration on Fundamental Principles and Rights at Work	2	The individual elements of the assessment are met or not as follows: Score 1 • Met: Commitment to ILO core principles: The Human Rights Policy indicates: 'we [...] uphold the following international human rights standards: [...] ILO Declaration on Fundamental Principles and Rights at Work'. [Human Rights Policy, N/A: s202.q4cdn.com] • Met: Explicitly lists all four ILO core principles: The Code of Conduct indicates: 'Our company is committed to complying with all laws regulating employment practices, including but not limited to [...] child labor, forced or involuntary labor, right to organize and collective bargaining'. Moreover, it 'prohibits any form of discrimination in the workplace'. The Company provided feedback to CHRB regarding this indicator, however, key evidence was already in use. [Code of Conduct, N/A: macysinc.com]

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			<p>Score 2</p> <ul style="list-style-type: none"> • Met: Expects suppliers to commit to ILO core principles: The Vendor and Supplier Code of Conduct has explicit requirements regarding each ILO core area as indicated below. The Company provided feedback to CHRB regarding this indicator, however, key evidence was already in use. [Vendor and Supplier Code of Conduct, 29/06/2022: content-az.equisolve.net] • Met: Explicitly lists all four ILO core principles for suppliers: The Vendor and Supplier Code of Conduct has explicit requirements regarding each ILO core area: discrimination, forced labour, child labour, freedom of association and collective bargaining, as indicated below. As for freedom of association and collective bargaining it adds: 'Suppliers shall recognize and respect the right of workers to freedom of association, organization, and collective bargaining. Suppliers shall not discipline or discriminate against workers who peacefully and lawfully associate, organize, or collectively bargain'. The Company provided feedback to CHRB regarding this indicator, however, key evidence was already in use. [Vendor and Supplier Code of Conduct, 29/06/2022: content-az.equisolve.net]
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 Human Rights Policy indicates: 'We foster an environment where colleagues are able to experience connection, achieve belonging, and build community. We know that these commitments are not possible if we do not respect their fundamental human rights. This includes the right to a safe and healthy work environment'. [Human Rights Policy, N/A: s202.q4cdn.com] • Not Met: Commitment to ILO working hours standards or 48 hour regular work week: The Company provided feedback to CHRB regarding this indicator making reference to the Vendor and Supplier Code of Conduct [see below], however, it is a supplier code. No evidence found of the Company explicitly committing to respect ILO conventions on working hours or that publicly states that (it's own) 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. [Vendor and Supplier Code of Conduct, 29/06/2022: content-az.equisolve.net] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Expects suppliers to commit to H&S of workers: The Vendor and Supplier Code of Conduct indicates: 'Suppliers shall provide a safe and healthy workplace setting to prevent accidents and injury to health arising out of, linked with, or occurring during work, or because of the operation of Supplier's facilities. Suppliers shall adopt responsible measures to mitigate negative impacts that the workplace has on the environment. Where residential housing is provided for workers, Suppliers will provide safe and healthy housing'. [Vendor and Supplier Code of Conduct, 29/06/2022: content-az.equisolve.net] • Met: Expects suppliers to commit to ILO working hours standards or 48 hour regular work week: The Vendor and Supplier Code of Conduct indicates: 'Suppliers shall not require workers to work more than the regular and overtime hours allowed by the law of the country where the workers are employed. The regular work week shall not exceed 48 hours. Other than in exceptional circumstances, the sum of regular and overtime hours in a week shall not exceed 60 hours. Suppliers shall allow workers at least 24 consecutive hours of rest in every seven-day period. All overtime work shall be consensual. Suppliers shall not request overtime on a regular basis and shall compensate all overtime work at a premium rate'. [Vendor and Supplier Code of Conduct, 29/06/2022: content-az.equisolve.net]
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: The Human Rights Policy indicates: 'We recognize that certain groups may be at heightened risk given their vulnerable status. For that reason, Macy's is a signatory of the Commitment to Responsible Recruitment —an effort to address potential forced labor risks for migrant workers in the global supply chain – and is taking steps to advance the rights of women and children across our supply chain'. However, although the Company indicates it is 'taking steps to advance the rights of women and children across our supply chain', no evidence found of a formal commitment to respect women's rights or children's rights. The Human Rights Statement indicates: 'Macy's is also taking steps to improve working conditions across the global supply chain. We recognize the importance of achieving equality in the apparel and textile industry and aim to support women's rights given the different dimensions of inequality women often face'. However, 'aim to' is not considered a formal statement of commitment according to CHRB wording criteria. It further discloses information on its collaboration with RISE. However, no evidence found that the Company is

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			<p>committed to respect women’s rights. [Human Rights Policy, N/A: s202.q4cdn.com] & [Human Rights Statement, 2023: s202.q4cdn.com]</p> <ul style="list-style-type: none"> • Not Met: Commitment to children's rights: See above. [Human Rights Policy, N/A: s202.q4cdn.com] • Not Met: Commitment to migrant worker's rights: The Human Rights Statement indicates: ‘We recognize that certain groups may be at heightened risk given their vulnerable status. For that reason, Macy’s is a signatory to the Commitment to Responsible Recruitment — an effort to address potential forced labor risks for migrant workers in the global supply chain – and is taking steps to advance the rights of women and children across our supply chain. As a result of this commitment, we have taken steps to increase oversight when auditing factories producing product sourced through our Private Brands sourcing team that are located in countries where migrant workers are most prevalent. As an example, we have employed a migrant worker survey to assess worker sentiment and ensure that no worker is paying for their job in facilities located in countries where migrant workers are at high risk’. However, no evidence found of a publicly available policy statement committing it to formally respect migrant workers’ rights. [Human Rights Statement, 2023: s202.q4cdn.com] • 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: The Company provided feedback to CHRB regarding this indicator, however no evidence found that the Company explicitly expects suppliers to committing it to respect to the relevant part(s) of the Convention on the Elimination of Discrimination Against Women (CEDAW) or the Women’s Empowerment Principles or to respect the relevant part(s) of the Convention on the Rights of the Child or the Children’s Rights and Business Principles or to respect relevant part(s) of the International Convention on the Protection of the Rights of All Migrant Workers and Members of Their Families. [Vendor and Supplier Code of Conduct, 29/06/2022: content-az.equisolve.net]
A.1.4	Commitment to remedy	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 remedy adverse HRs impacts: The Human Rights Policy indicates: ‘Macy’s, Inc. is committed to providing access to effective remedy where we cause or contribute to an adverse human rights impact’. [Human Rights Policy, N/A: s202.q4cdn.com] • 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: The Human Rights Statement indicates: ‘There are many human rights issues beyond the most salient risks material to our business, so we work with partners to address both potential and actual human rights issues throughout our supply chain. This may be through multi-stakeholder programs, audits, corrective action plans, self-assessments, capability building and training’. However, no formal commitment to work with them to provide effective remedy for those affected. Address is not considered a proxy in the context of this indicator. [Human Rights Statement, 2023: s202.q4cdn.com]
A.1.5	Commitment to respect the rights of human rights defenders	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: Zero tolerance of threats/attacks on HRDs: The Human Rights Policy indicates: ‘One way we support our community is by respecting the rights of human rights defenders. We recognize the important work of defenders around the world and will not abide threats, intimidation, and attacks (both physical and legal) against human rights defenders’. [Human Rights Policy, N/A: s202.q4cdn.com] • Not Met: Expects suppliers to make this commitment <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Commitment to working with HRDs to create safe and enabling environment: The Human Rights Statement indicates: ‘We recognize the importance of human rights defenders (HRDs), people who individually or with others act, promote, or protect human rights in a peaceful manner, in elevating salient risks to the forefront of global awareness about potential human rights abuses. We are also aware that peaceful HRDs are often threatened for their efforts to protect workers and we strongly condemn any retaliation, harassment, attacks, or other mistreatment of HRDs. When appropriate, we have engaged with

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			peaceful HRDs and have adjusted our approach to compliance based on their findings in the area of migrant workers'. However, this subindicator looks for a commitment to work with human rights defenders to create safe and enabling environments for civic engagement and human rights at local, national or international levels. [Human Rights Statement, 2023: s202.q4cdn.com]

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.2.1	Commitment from the top	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Met: Board level responsibility for HRs: The Company states that: 'The Nominating and Corporate Governance Committee of the Board of Directors oversees policies and practices related to political, human rights, social and environmental issues, sustainability initiatives and reporting'. [Human Rights Policy, N/A: s202.q4cdn.com] Not Met: Describes HRs expertise of Board member: The Company provided feedback to CHRB regarding this indicator, however evidence was not material. Score 2 <ul style="list-style-type: none"> Not Met: Board member/CEO signal importance of HRs in their communications: The CEO has published a video in LinkedIn on sustainability. It explains it's the strategy of its platform Mission Every One. It points out that human rights and women's' rights are a priority. However, no communication found where Board members or the CEO clearly signal the Company's commitment to human rights, discussing why human rights matter to the business or any challenges to respecting human rights encountered by the business. [Macy's en LinkedIn_web, N/A: linkedin.com]
A.2.2	Board responsibility	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Met: Process to review HRs strategy at board level: The Human Rights Statement indicates: 'The Nominating and Corporate Governance Committee of the Macy's, Inc. Board of Directors oversees policies and practices related to political, human rights, social and environmental issues, sustainability initiatives and reporting. The Nominating and Corporate Governance Committee is updated twice a year by the VP of Sustainability, who is accountable for the implementation of our Human Rights Policy'. [Human Rights Statement, 2023: s202.q4cdn.com] 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: The Company provided feedback to CHRB regarding this indicator, however, no description found of the process it has in place to discuss and review its business model and strategy for inherent risks to human rights at Board level or a Board committee. This indicator focuses on the Company business model rather than focusing on the risk. [Our Commitments & Policies_web, N/A: macysinc.com] 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	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Score of 1 on A.1.2.a • Met: Senior responsibility for HRs implementation and decision making: The Company indicates in its Human Rights Policy that the Corporate Strategy Group (CSG) comprises the most senior members of its management team and oversees the governance practices that reinforce its accountability to its commitments. [Human Rights Policy, N/A: s202.q4cdn.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Describes day-to-day responsibility for implementing HRs commitments: The Human Rights Statement indicates: ‘VP of Sustainability, [...] is accountable for the implementation of our Human Rights Policy’. Also, ‘Macy’s sustainability and social compliance programs are overseen by the company’s Chief Supply Chain Officer, who reports directly to the company’s Chief Operating Officer, who reports to the Chief Executive Officer and Chairman of the Board. The company’s related policies and practices are informed and reviewed by internal members of its Sustainability Steering committee. This group meets monthly and consists of senior leadership across Sustainability, Finance, Legal and Corporate Communications functions. The committee is led by the VP of Sustainability with a focus on metrics and impacts, opportunity areas, and resources’. [Human Rights Statement, 2023: s202.q4cdn.com] • Not Met: Day-to-day resources and expertise allocation in own operations: See above. No description found of how it allocates resources and expertise for the day-to-day management of relevant human rights issues within its own operations (team responsible, composition of the team like people allocated, geographical distribution, expertise, etc.), as opposed to allocation of responsibility, which is assessed in the previous subindicator. [Human Rights Statement, 2023: s202.q4cdn.com] • Not Met: Resources and expertise allocation in supply chain: The Human Rights Statement indicates: ‘Suppliers of Private Brands sourced through our Private Brands sourcing team are required to confirm their notice and understanding by signature. The Human Rights strategy is implemented by a Senior Director of Human Rights. This position oversees a domestic and international team that manages the day-to-day activities needed to implement appropriate oversight of human rights risks’. However, no further description found of how it allocates resources and expertise for the day-to-day management of relevant human rights issues within its supply chain (team responsible, composition of the team like people allocated, geographical distribution, expertise, etc.) [Human Rights Statement, 2023: s202.q4cdn.com]
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"> • Not Met: Senior manager incentives linked to HRs commitments • Not Met: Incentive scheme linked to key HRs risks beyond employee H&S: The Company provided feedback to CHRB regarding this indicator, referencing to its Human Rights Statement, however, no evidence found of an incentive scheme that covers at least one of the key sector risks that the Company considers salient. [Human Rights Statement, 2023: s202.q4cdn.com] <p>Score 2</p> <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	<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 risks integrated as part of enterprise risk system: The Human Rights Statement indicates: ‘In 2021, Macy’s engaged a third-party expert to perform a saliency and gap analysis risk assessment. Internal and external interviews were conducted. Internal stakeholders included members of Legal, Sourcing, Sustainability, Logistics, Procurement and Facilities. External Stakeholders included the ILO, UNICEF, Solidaridad Network and Fair Wear Foundation, among others. From the findings, we have prioritized the most salient risks – freedom from discrimination and the right to just and favorable work conditions’. However, it is not clear how these (or other human-rights related) processes are integrated as

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			<p>part of its broader enterprise risk management systems. [Human Rights Statement, 2023: s202.q4cdn.com]</p> <ul style="list-style-type: none"> • Not Met: Provides an example: The Company provided feedback to CHRB regarding this indicator, however, no examples found of how it manages human rights related risks within the broader enterprise risk management system; or, in case of their occurrence, examples of the negative impacts it may have to the Company. [Our Commitments & Policies_web, N/A: macysinc.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Risk assesment by Audit Committee or independent third party
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"> • Met: Score of 1 on A.1.2.a: See A.1.2.a • Not Met: Communicates HRs policies to all workers in own operations: The Human Rights Statement indicates: ‘Human rights oversight is embedded in our organization across multiple levels. Risk analysis, training and awareness raising are implemented across our internal teams and our wider supply chain’. However, no details found describing how it is actually being carried out. [Human Rights Statement, 2023: s202.q4cdn.com] <p>Score 2</p> <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	0.5	<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: 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 <p>Score 2</p> <ul style="list-style-type: none"> • Met: Describes how HRs policies are contractual/binding for suppliers: The Company states in its Vendor and Supplier Code of Conduct that it will: 'only do business with companies that share our commitment to human rights and integrity and abide by the principles set forth in our Code' and that it will take appropriate action upon notification of a violation of standards established by it. It is also indicated that this Vendor Code applies to anyone, including suppliers, vendors, contractors, licensees, and agents, that supplies merchandise to Macy’s, as well as other vendors who agree by contract to follow these principles (collectively “Suppliers”). [Vendor and Supplier Code of Conduct, 29/06/2022: content-az.equisolve.net] • Not Met: Requires suppliers to cascade contractual/binding HRs policies to its suppliers
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"> • 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 it provides annual training to all colleagues, alternating between its Code of Conduct and General Legal Compliance Training, however, the Code does not include relevant Human Rights content. The Human Rights Statement indicates: ‘Human rights oversight is embedded in our organization across multiple levels. Risk analysis, training and awareness raising are implemented across our internal teams and our wider supply chain’. However, no description of the training or of the content of the training found. [Sustainability fact sheet: s202.q4cdn.com] & [Human Rights Statement, 2023: s202.q4cdn.com] • Not Met: Trains relevant managers including procurement on HRs: The Company indicates that Macy’s Private Brand product-development, sourcing, and overseas colleagues receive training related to requirements, expectations, and internal compliance policies on topics relevant to their roles. The Human Rights Statement indicates: ‘Our merchants and our Private Brands sourcing and design teams are trained on social compliance annually. Additionally, our Private Brands sourcing team is required to annually review our Zero Tolerance Offense training’. However, no evidence was found that these training programmes comprise its Human Rights commitments. [Sustainability fact sheet: s202.q4cdn.com] & [Human Rights Statement, 2023: s202.q4cdn.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Score of 2 on A.1.2.a • Not Met: Meets both requirements under score 1: See above. • Not Met: Trains suppliers to meet HRs commitments: The Sustainability fact sheet indicates that 'Macy’s utilizes a supply chain mapping platform to [...] track completion of training materials for our suppliers. Training topics currently include Human Trafficking and Slavery, Forced Labor, Responsible Recruitment, Conflict

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Minerals and Code of Conduct standards'. The Human Rights Statement adds: 'Risk analysis, training and awareness raising are implemented across our internal teams and our wider supply chain'. However, no further information or description of the training was found. [Sustainability fact sheet: s202.q4cdn.com] & [Human Rights Statement, 2023: s202.q4cdn.com]</p> <ul style="list-style-type: none"> • Not Met: Discloses % suppliers trained
B.1.6	Monitoring and corrective actions	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: Score of at least 1 on A.1.2.a • Met: Monitors implementation of HRs policy commitments across global ops and supply chain: The Company states in its Human Rights Policy that it has a comprehensive social compliance auditing program that tracks violations, corrective action plans, remediation, and progress. This program includes a supply chain mapping platform that tracks supplier performance, increases transparency, and allows it to track completion of training materials for its suppliers. It also indicates that it monitors its organization to ensure compliance with company policies and applicable laws. [Human Rights Policy, N/A: s202.q4cdn.com] & [Sustainability fact sheet: s202.q4cdn.com] • Not Met: Discloses % of supply chain monitored: The Human Rights Statement indicates: 'In 2022, we performed 573 social compliance audits'. However, it is not clear the proportion of its supply chain it represents. The Company has provided comments to CHRB regarding this indicator. However, its content has not been found in publicly available sources. [Human Rights Statement, 2023: s202.q4cdn.com] • Met: Describes how workers are involved in monitoring: The Human Rights Statement indicates: 'Our front line of defense is the Social Compliance team, which monitors social compliance at factories, works with our third-party audit firm to collaboratively address non-compliances, and works to build supplier capabilities to improve performance for the future'. [Human Rights Statement, 2023: s202.q4cdn.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Score of 2 on A.1.2.a • Met: Describes corrective actions process: The Human Rights Statement indicates: 'If high-risk issues are identified, we engage with the factory and investigate the issue to determine the root cause(s) and to understand the cause of the breakdown in their management systems and operations. This exercise serves as guidance in creating a corrective action plan that will be successful over the course of time to avoid recurring issues. For example, after an audit is conducted, a factory is required to create an initial CAP to address any non-compliances discovered during the audit, including any adverse human rights impacts that were caused or contributed to. After approval of this initial plan, depending on the audit result and the findings of the audit, the factory will be required to submit either a 30-day or a 60-day corrective action and remediation plan. Along with the 30-day or 60-day plan, the factory must provide evidence of corrections and improvement. The goal of CAP Management is to help the factory develop an acceptable and effective corrective action plan and review evidence of closure within the designated time frame. Factories and suppliers are expected to learn from this process and avoid repetition of non-compliances on any follow-up audits'. [Human Rights Statement, 2023: s202.q4cdn.com] • Not Met: Discloses findings and number of correction action processes: The Human Rights Statement indicates: 'In 2022, we performed 573 social compliance audits, 536 of which resulted in Corrective Action Plans (CAPs)'. However, no further details found on the findings of its human rights monitoring process. [Human Rights Statement, 2023: s202.q4cdn.com]
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 that it will only do business with companies that share its commitment to human rights and integrity and abide by the principles set forth in the Vendor and Supplier Code of Conduct. The Company also indicates in its Sustainability Fact Sheet that it does rigorous screening of new suppliers, however, no description of how human rights performance is taken into account in the selection of potential business relationships was found. [Vendor and Supplier Code of Conduct, 29/06/2022: content-az.equisolve.net] & [Sustainability fact sheet: s202.q4cdn.com] • Met: HRs performance affects continuation supplier relationships: The Company indicates in its Human Rights Policy that in some cases related to identified human rights high-risks violations, the supplier and/or factory relationship may be terminated. [Human Rights Policy, N/A: s202.q4cdn.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			Score 2 <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	The individual elements of the assessment are met or not as follows: Score 1 <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 Score 2 <ul style="list-style-type: none"> • Not Met: Analysis of stakeholder views on company's HRs issues • Not Met: Describes how stakeholders views influenced company's HRs approach: The Company provided feedback to CHRB regarding this indicator, which contained among other information a case study in which stakeholders had been engaged in interviews. However, it is not clear how these views have influenced the development or monitoring of its human rights approach. [Human Rights Statement, 2023: s202.q4cdn.com]

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.1	Identifying human rights risks and impacts	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Describes process of identifying risks in own operations: See below. This subindicator focuses on the process to identify human rights risks and impacts within its own operations and current evidence seems to make reference to its supply chain. [Human Rights Statement, 2023: s202.q4cdn.com] & [Responsible Supply Chain Traceability Statement, N/A: s202.q4cdn.com] • Met: Describes process for identifying risks in business relationships: The Human Rights Statement notes: 'In 2021, Macy's engaged a third-party expert to perform a saliency and gap analysis risk assessment. Internal and external interviews were conducted. Internal stakeholders included members of Legal, Sourcing, Sustainability, Logistics, Procurement and Facilities. External Stakeholders included the ILO, UNICEF, Solidaridad Network and Fair Wear Foundation, among others. From the findings, we have prioritized the most salient risks – freedom from discrimination and the right to just and favorable work conditions. We closely monitor that Private Brands sourced through our Private Brands sourcing team are produced in an ethical and responsible manner while also taking steps to improve working conditions across the global supply chain'. The Responsible Supply Chain Traceability Statement indicates: 'We have developed a targeted approach to strengthen our due diligence [...]. We are actively monitoring and managing the human rights risks associated with the production of Cotton products, within Macy's private brands, using multiple sources of data to map high-risk areas and identify potential connections to forced labor'. [Human Rights Statement, 2023: s202.q4cdn.com] & [Responsible Supply Chain Traceability Statement, N/A: s202.q4cdn.com] Score 2 <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
B.2.2	Assessing human rights risks and impacts	0.5	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: The Human Rights Statement notes: 'In 2021, Macy's engaged a third-party expert to perform a saliency and gap analysis risk assessment. Internal and external interviews were conducted. Internal stakeholders included members of Legal, Sourcing, Sustainability, Logistics, Procurement and Facilities. External Stakeholders included the ILO, UNICEF, Solidaridad Network and Fair Wear Foundation, among others'. However, it is not clear how relevant factors are taken into account, such as geographical, economic, social and other factors. [Human Rights Statement, 2023: s202.q4cdn.com] • Met: Describes how process applies to supply chain: The Human Rights Statement notes: 'In 2021, Macy's engaged a third-party expert to perform a saliency and gap analysis risk assessment. Internal and external interviews were conducted. Internal stakeholders included members of Legal, Sourcing, Sustainability, Logistics, Procurement and Facilities. External Stakeholders included the ILO, UNICEF, Solidaridad Network and Fair Wear Foundation, among others. [...] we regularly take steps to identify salient risks in our supply chain. We then focus on these risk

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>areas in our human rights due diligence programs. This risk-based approach concentrates on specific high-risk geographies and activities where we work to mitigate or remediate any critical issues that may arise'. Also, 'As part of our human rights due diligence process, we continuously monitor risk throughout the supply chain through our supply chain traceability program. In addition to regular social compliance audits, we monitor high-risk materials through supply chain mapping, geographic-based risk modeling, and human intelligence. We partner with a supply chain traceability platform to map high-risk areas and identify potential connections to forced labor and other human rights abuses'. [Human Rights Statement, 2023: s202.q4cdn.com]</p> <ul style="list-style-type: none"> • Not Met: Public disclosure of results of HRs risk assessment: The Human Rights Statement indicates: 'we have prioritized the most salient risks – freedom from discrimination and the right to just and favorable work conditions'. However, no further details of the results of its assessments found, as this subindicator expects specific issues and explicit mention was found only in relation to discrimination. [Human Rights Statement, 2023: s202.q4cdn.com] <p>Score 2</p> <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	0.5	<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: Describes system to prevent, mitigate and remediate HRs issues: See below. Information found seems to apply to its supply chain. This subindicator looks for evidence of a system to prevent or mitigate the different human rights risks and impacts to which it is exposed for its own operations. [Human Rights Statement, 2023: s202.q4cdn.com] • Met: Describes how global system applies to supply chain: The Human Rights Statement indicates: 'There are many human rights issues beyond the most salient risks material to our business, so we work with partners to address both potential and actual human rights issues throughout our supply chain. This may be through multi-stakeholder programs, audits, corrective action plans, self-assessments, capability building and training. [...] Our social compliance program is designed to help drive the factory towards improvement to positively impact the well-being of the workers. Willingness and cooperation are taken into consideration when assessing risk and will go a long way when working through the corrective action and remediation processes. Meeting or exceeding the standards set forth in Macy's Vendor and Supplier Code of Conduct and the local law is the minimum expectation for all facilities. Within our risk categories are several Zero Tolerance issues upon which we focus specific remediation activities'. [Human Rights Statement, 2023: s202.q4cdn.com] • Not Met: Example of actions decided on at least 1 salient HRs issue: The Human Rights Statement indicates: 'In August 2022, Macy's was contacted regarding allegations of unfair or unethical worker treatment and termination practices in one of our supplier's factories in Indonesia. In alignment with our social compliance policies, Macy's investigated the allegations. Macy's contacted the supplier immediately after learning of the allegations to express both our concerns and expectations. The supplier was very engaged and presented evidence to suggest that the allegations were not true and that the workers were terminated either due to poor performance or willingly left for personal reasons. Considering the inconsistencies between the allegations and the evidence presented, Macy's engaged its auditor to conduct worker surveys and worker interviews. The supplier was informed and agreed to the workers' participation. During this time, Macy's local sourcing leadership team continued discussions with the supplier. After the investigation, no conclusive evidence was found to support the allegations. However, Macy's learned that during this same time frame, the supplier was also being investigated by local government authorities. Generally speaking, it is Macy's position to support local government findings and to use our increased factory monitoring, including continued communication with the supplier and additional social compliance audits completed at the site in question. In the event new evidence is presented from audits or NGO sources, Macy's would highly encourage the factory and its management to undergo training regarding the importance of allowing unrestricted freedom of association'. However, this example seems to showcase a specific non-compliance case and how the Company handles it. No example has been found of the specific proactive actions taken or to be taken on at least one of its salient human rights issues as a result of the human rights risk assessment process. [Human Rights Statement, 2023: s202.q4cdn.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets all requirements under score 1

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • 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	<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 system for evaluation effectiveness of actions • Not Met: Example of lessons learned from evaluation effectiveness of actions <p>Score 2</p> <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	<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: Provides two examples of comms with stakeholders: The Company provided feedback to CHRB regarding this indicator, however, no examples found demonstrating how it communicates with affected stakeholders regarding specific human rights impacts raised by them or on their behalf. The Company is expected to provide two examples. [Human Rights Statement, 2023: s202.q4cdn.com] <p>Score 2</p> <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	1.5	<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: Grievance mechanism accessible to all workers: The Company indicates that it provides a confidential, third-party Compliance Connection toll-free telephone line and web reporting service for reports of suspected misconduct or violations of the Code of Conduct. [Sustainability fact sheet: s202.q4cdn.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Grievance mechanism available in appropriate languages and workers made aware: The Human Rights Statement indicates: ‘We strive to ensure global suppliers provide workers throughout our supply chain with the opportunity to report concerns without fear of retaliation. We currently partner with Nirapon to promote a culture of safety in factories in Bangladesh. In addition to safety support and worker training, Nirapon’s Amader Kotha Helpline Services provide workers with a direct voice on safety and other issues’. However, the training seems to apply to Bangladeshi supply chain workers only. This subindicator focuses on how the Company ensures workers [at its own operations] are made aware of the grievance mechanisms. It adds: ‘Human rights oversight is embedded in our organization across multiple levels. Risk analysis, training and awareness raising are implemented across our internal teams’. However, it is not clear it covers grievance mechanisms as its Human Rights Policy does not seem to make reference to it. Moreover, it is not clear the channels are available in all appropriate languages. [Human Rights Statement, 2023: s202.q4cdn.com] • Met: Describes how workers in supply chain access grievance mechanism: The Company indicates that it provides a grievance channel for suppliers to report any improper conduct or violation of the Vendor and Supplier Code of Conduct. [Vendor and Supplier Code of Conduct, 29/06/2022: content-az.equisolve.net] • Not Met: Expects suppliers to convey expectation to their suppliers
C.2	Grievance mechanism(s) for external individuals and communities	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: Grievance mechanism accessible to all external individuals and communities: The 2022 Sustainability Fact Sheet indicates: ‘Our company culture encourages people to speak up and do the right thing. We make it easy for our colleagues to report suspected misconduct through our confidential, third-party Compliance Connection toll-free telephone line and web reporting service. [...] We also offer a separate hotline for our suppliers to report their concerns’. The Human Rights Statement indicates: ‘We strive to ensure global suppliers provide workers throughout our supply chain with the opportunity to report concerns without fear of retaliation’. However, it is not clear these channels are also open to individual or communities who may be adversely impacted by the Company. [Human Rights Statement, 2023: s202.q4cdn.com] & [2022 Sustainability Fact Sheet, 2023: s202.q4cdn.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Grievance mechanism available in appropriate languages and affected stakeholders made aware: The Human Rights Statement indicates: ‘We strive to ensure global suppliers provide workers throughout our supply chain with the opportunity to report concerns without fear of retaliation. We currently partner

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>with Nirapon to promote a culture of safety in factories in Bangladesh. In addition to safety support and worker training, Nirapon’s Amader Kotha Helpline Services provide workers with a direct voice on safety and other issues’. However, the training seems to apply to Bangladeshi supply chain workers only. This subindicator focuses on how the Company ensures all affected external stakeholders, including communities, at its own operations are made aware of it. Moreover, it is not clear the channels are available in all appropriate languages. [Human Rights Statement, 2023: s202.q4cdn.com]</p> <ul style="list-style-type: none"> • 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	<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 users engaged on design and performance • Not Met: Provides user engagement examples (at least two) on design and performance <p>Score 2</p> <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	<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 procedure and timescales for managing complaints or concerns: The Company describes that in the reporting process: the issue will be assigned for investigation; the investigators will gather information and determine facts; the investigation will be prompt and the investigators may recommend corrective action, if necessary, to appropriate managers for implementation. The Company also indicates that, in each case, the reporting colleague will be told how feedback will be provided on the colleague’s questions or concerns; in some situations, however, because of the nature of the inquiry, the company may not be able to provide feedback on the investigation. However, no timescales for this procedure were found. [Code of Conduct, N/A: macysinc.com] • Not Met: Describes technical, financial, advisory support to enable equal access <p>Score 2</p> <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	<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: Public statement prohibiting retaliation against workers/stakeholders: The Company states that it absolutely prohibits retaliation against anyone who uses his or her voice to report a potential violation that he or she reasonably believes has occurred or is likely to occur, however, no prohibition of retaliation against external stakeholders was found. [Code of Conduct, N/A: macysinc.com] • Not Met: Describes practical measures to prevent retaliation: The Company indicates that the reports can be done anonymously, however, no evidence that this includes external stakeholders was found. [Code of Conduct, N/A: macysinc.com] <p>Score 2</p> <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	<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: Complainants not asked to waive legal rights • Not Met: Does not require confidentiality provisions <p>Score 2</p> <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	<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 approach taken to remedy adverse HRs impacts: The Human Rights Statement indicates: ‘In August 2022, Macy’s was contacted regarding allegations of unfair or unethical worker treatment and termination practices in one of our supplier’s factories in Indonesia. In alignment with our social compliance policies, Macy’s investigated the allegations. Macy’s contacted the supplier immediately after learning of the allegations to express both our concerns and expectations. The supplier was very engaged and presented evidence to suggest that the allegations were not true and that the workers were terminated either due

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>to poor performance or willingly left for personal reasons. Considering the inconsistencies between the allegations and the evidence presented, Macy's engaged its auditor to conduct worker surveys and worker interviews. The supplier was informed and agreed to the workers' participation. During this time, Macy's local sourcing leadership team continued discussions with the supplier. After the investigation, no conclusive evidence was found to support the allegations. However, Macy's learned that during this same time frame, the supplier was also being investigated by local government authorities. Generally speaking, it is Macy's position to support local government findings and to use our increased factory monitoring, including continued communication with the supplier and additional social compliance audits completed at the site in question. In the event new evidence is presented from audits or NGO sources, Macy's would highly encourage the factory and its management to undergo training regarding the importance of allowing unrestricted freedom of association'. However, although the example showcases a specific non-compliance case and how the Company handles it, it is not clear the approach it took to provide or enable a timely remedy for victims, in specific. [Human Rights Statement, 2023: s202.q4cdn.com]</p> <ul style="list-style-type: none"> • Not Met: Describes how remedy would be provided if no adverse impact identified: The Human Rights Statement indicates: 'Within our risk categories are several Zero Tolerance issues upon which we focus specific remediation activities, including: [...] Confirmed Systematic Child Labor (currently under legal age) – Onsite factory improvement visit will be conducted to provide insight into the factory's hiring practices. From this insight, the factory will be provided with guidance to improve the current practices. If childcare facilities are located at the factory, they should be located away from the production or warehouse areas so that children cannot wander onto the floor. The factory will not be able to receive new orders until the issue is fully resolved and confirmed through the verification audit. Physical and Sexual Harassment and Abuse – Factory will need to allow workers to participate in a worker sentiment survey. Failure to reimburse recruitment fees to workers within 90 days – Factory must repay all recruitment fees within 90 days from discovery of the issue, and they will be required to go through training to ensure Macy's expectations, which follow the ILO guidance, are adhered to going forward. Factory will need to allow workers to participate in a survey. Structural collapse or critical building safety risk – Within 30 days, the factory will need to undergo a special building assessment to ensure the root cause and severity of the issue is identified and then resolved appropriately. Emergency exits are locked from the inside in work areas or dormitories – Onsite safety training will be required for the factory. Emergency exits must be updated to open from the inside so employees can exit safely'. As for forced labour: 'In the event that forced labor is discovered as part of our social compliance audit program, further investigation is done to determine the root cause of the issue. The factory will be required to allow workers to participate in a worker sentiment survey. The factory will not be able to receive new orders until the issue is fully resolved and confirmed through the verification audit'. However, no further evidence found of how it takes to provide or enable timely remedy for victims. [Human Rights Statement, 2023: s202.q4cdn.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describes changes to systems, processes and practices to prevent future impacts: See above. However, the subindicator looks for a description of changes to systems, processes and practices to prevent similar adverse impacts [adverse human rights impacts which it has caused or to which it has contributed] in the future. No further evidence found. [Human Rights Statement, 2023: s202.q4cdn.com] • Not Met: Describes approach to monitoring/implementing agreed remedy: See above. In some examples of specific remediation activities it provides a monitoring system, for instance: 'Access Denied – Fee for the audit that resulted in Access Denied will not be refunded. An unannounced social compliance audit will be scheduled at the supplier or factory's expense. The factory will not be able to receive new orders until the unannounced audit takes place and the results are confirmed acceptable. Future audits will be conducted on an unannounced basis until it is confirmed that the factory is fully transparent'. Or 'Confirmed Fraud (i.e., double sets of timecard/payroll records) and Inconsistencies between records that indicate forced labor (hours worked without receiving payment for time worked) or not meeting the minimum wage requirement – Onsite training at the factory will be conducted to explain the importance of sharing true and accurate records. A worker survey will be deployed during the next audit'. However, among the human rights related remediation activities provided, no description of its approach to

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>monitoring implementation of the agreed remedy found. [Human Rights Statement, 2023: s202.q4cdn.com]</p> <ul style="list-style-type: none"> • Not Met: Describes approach to learning from incidents if no adverse impacts identified: The Human Rights Statement indicates: ‘The company’s [sustainability and social compliance] related policies and practices are informed and reviewed by internal members of its Sustainability Steering committee’. However, this subindicator looks for a description the approach it would take to review and change systems, processes or practices [in the light of adverse impacts] to prevent similar adverse impacts in the future. No further evidence found. [Human Rights Statement, 2023: s202.q4cdn.com]
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"> • 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 <p>Score 2</p> <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.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"> • Not Met: Requirements on living wage in supplier codes and contracts • Not Met: Describes work with suppliers on living wage <p>Score 2</p> <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	<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 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 <p>Score 2</p> <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	<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: Identifies direct and indirect suppliers including manufacturing sites: The Sustainability fact sheet indicates that ‘Macy’s utilizes a supply chain mapping platform to follow supplier performance, increases value chain transparency and track completion of training materials for our suppliers’. The Human Rights Statement indicates: ‘As part of our human rights due diligence process, we continuously monitor risk throughout the supply chain through our supply chain traceability program. In addition to regular social compliance audits, we monitor high-risk materials through supply chain mapping, geographic-based risk modeling, and human intelligence. We partner with a supply chain traceability platform to map high-risk areas and identify potential connections to forced labor and other human rights abuses. We continuously evaluate these efforts and explore new approaches to support and grow our traceability programs’. However, it is not clear whether the Company maps all its suppliers, including indirect ones. [Sustainability fact sheet: s202.q4cdn.com] & [Human Rights Statement, 2023: s202.q4cdn.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Discloses names and locations of significant parts of supply chain and how significance was defined: The 2022 Sustainability Fact Sheet indicates: ‘Macy’s utilizes a supply chain mapping platform to follow supplier performance, increases value chain transparency and track completion of training materials for our suppliers. Training topics currently include Human Trafficking and Slavery, Forced Labor, Responsible Recruitment, Conflict Minerals and Code of Conduct standards’. However, this subindicator looks for the disclosure of names and specific locations of the direct and indirect suppliers who make up the most significant parts of its supply chain and an explanation of how it has defined what are the most significant parts of its supply chain. No further evidence found. [2022 Sustainability Fact Sheet, 2023: s202.q4cdn.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not Met: Discloses direct or indirect suppliers involved in higher-risk activities
D.2.4.b	Prohibition of child labour: Age verification and corrective actions (in the supply chain)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Requirements on child labour in supplier codes and contracts: The Vendor and Supplier Code of Conduct states: 'No person shall be employed under the age of 15 (or 14 where the governing law allows) or younger than the age for completing compulsory education, whichever is higher. Persons under the age of 18 shall not be employed in work that is hazardous or likely to jeopardize their health, safety, or morals. Suppliers must comply with all age-related working restrictions as set by local law and adhere to international standards as defined by the ILO regarding age-appropriate work'. However, no information was found regarding verifying the age of workers recruited, and remediation programmes. The Company provided feedback to CHRB regarding this indicator, however, key evidence was already in use. No further evidence found. [Vendor and Supplier Code of Conduct, 29/06/2022: content-az.equisolve.net] • Not Met: Describes work with suppliers on eliminating child labour <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of scope of child labour in supply chain • Not Met: Analysis of trends demonstrating progress
D.2.5.b	Prohibition of forced labour: Recruitment fees and costs (in the supply chain)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Requirements on debt/fees in supplier codes and contracts: The Vendor and Supplier Code of Conduct states: 'All workers have the right to engage in work willingly and have full freedom of movement, [...] without the payment of fees for their employment'. The Human Rights Statement indicates the Company is a signatory to the AAFA/FLA Apparel and Footwear Industry Commitment to Responsible Recruitment. The webpage AAFA/FLA Apparel & Footwear Industry Commitment to Responsible Recruitment discloses the commitment: 'We commit to work with our global supply chain partners to create conditions so that: No workers pay for their job; Workers receive a timely refund of fees and costs paid to obtain or maintain their job [...]'. Also: 'companies who sign the Commitment to Responsible Recruitment agree to do the following: Incorporate the Commitment to Responsible Recruitment into their company social compliance standards, such as their code of conduct within one year from the date of signing; Periodically report on their actions to imbed elements of the Commitment to Responsible Recruitment in company's policies and processes, such as through their sustainability reporting and/or modern slavery legal disclosures'. However, no prohibition was found related to third-party recruitment intermediaries imposing financial burdens on job seekers by collecting fees. [Vendor and Supplier Code of Conduct, 29/06/2022: content-az.equisolve.net] & [Commitment to Responsible Recruitment - AAFA/FLA Apparel & Footwear Industry, 2023: aafaglobal.org] • Not Met: Describes work with suppliers on debt/fees for job seekers/workers: Regarding Failure to reimburse recruitment fees to workers within 90 days, the Human Rights Statement indicates: 'Factory must repay all recruitment fees within 90 days from discovery of the issue, and they will be required to go through training to ensure Macy's expectations, which follow the ILO guidance, are adhered to going forward. Factory will need to allow workers to participate in a survey'. However, current evidence seems to be corrective actions in response to non-compliance. It adds: 'Macy's is a signatory to the Commitment to Responsible Recruitment — an effort to address potential forced labor risks for migrant workers in the global supply chain — and is taking steps to advance the rights of women and children across our supply chain. As a result of this commitment, we have taken steps to increase oversight when auditing factories producing product sourced through our Private Brands sourcing team that are located in countries where migrant workers are most prevalent. As an example, we have employed a migrant worker survey to assess worker sentiment and ensure that no worker is paying for their job in facilities located in countries where migrant workers are at high risk'. However, it is not clear how it proactively works with suppliers [beyond monitoring] to eliminate recruitment fees and related costs, including by ensuring full reimbursement to workers where relevant. [Human Rights Statement, 2023: s202.q4cdn.com] <p>Score 2</p> <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.d	Prohibition of forced labour: Wage practices (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"> • Not Met: Requirements on paying in full and on time in supplier codes and contracts: The Human Rights Statement indicates the Company is a signatory to the AAFA/FLA Apparel and Footwear Industry Commitment to Responsible Recruitment. The webpage AAFA/FLA Apparel & Footwear Industry Commitment to Responsible Recruitment discloses the commitment: 'We commit to work with our global supply chain partners to create conditions so that: No workers pay for their job; Workers receive a timely refund of fees and costs paid to obtain or maintain their job Workers retain control of their travel documents and have full freedom of movement; and All workers are informed, in a language they understand, of the basic terms of their employment before leaving their country of origin'. Also: 'companies who sign the Commitment to Responsible Recruitment agree to do the following: Incorporate the Commitment to Responsible Recruitment into their company social compliance standards, such as their code of conduct within one year from the date of signing; Periodically report on their actions to imbed elements of the Commitment to Responsible Recruitment in company's policies and processes, such as through their sustainability reporting and/or modern slavery legal disclosures'. However, no evidence found that suppliers are required [contractually or through its supplier code] to pay in full and on time. [Human Rights Statement, 2023: s202.q4cdn.com] & [Commitment to Responsible Recruitment - AAFA/FLA Apparel & Footwear Industry, 2023: aafaglobal.org] • Not Met: Describes work with suppliers on paying workers regularly, in full and on time: The Company provided feedback to CHRB regarding this indicator, however, no description found of how it works with its supply chain to pay workers regularly, in full and on time. [Human Rights Statement, 2023: s202.q4cdn.com] <p>Score 2</p> <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.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"> • Met: Requirements on free movement in supplier codes and contracts: The Company states in its Vendor and Supplier Code of Conduct that all workers have the right to engage in work willingly and have full freedom of movement, without surrendering travel documents. [Vendor and Supplier Code of Conduct, 29/06/2022: content-az.equisolve.net] • Not Met: Describes working with suppliers on free movement of workers <p>Score 2</p> <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.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"> • Not Met: Requirements on FoA/CB in suppliers codes and contracts: The Vendor and Supplier Code of Conduct states: 'Suppliers shall recognize and respect the right of workers to freedom of association, organization, and collective bargaining. Suppliers shall not discipline or discriminate against workers who peacefully and lawfully associate, organize, or collectively bargain'. However, it is not clear if this applies in all circumstances. The Company provided feedback to CHRB regarding this indicator, however, key evidence was already in use. No further evidence found. [Vendor and Supplier Code of Conduct, 29/06/2022: content-az.equisolve.net] • Not Met: Describes work with suppliers on FoA/CB <p>Score 2</p> <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.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"> • Met: Requirements on H&S in supplier codes and contracts: The Company states that: 'Suppliers shall provide a safe and healthy workplace setting to prevent accidents and injury to health arising out of, linked with, or occurring during work, or because of the operation of Supplier's facilities' and that: 'Where residential housing is provided for workers, Suppliers will provide safe and healthy housing'. [Vendor and Supplier Code of Conduct, 29/06/2022: content-az.equisolve.net] • 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

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <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.b	Women's rights (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"> • Not Met: Requirements on women's rights in contracts/codes with suppliers: The Human Rights Statement indicates: 'Macy's is also taking steps to improve working conditions across the global supply chain. We recognize the importance of achieving equality in the apparel and textile industry and aim to support women's rights given the different dimensions of inequality women often face. We have measures in place to eliminate health and safety concerns prevalent among women workers including sexual harassment, physical security, and protection and accommodation of pregnant and nursing workers'. However, it is not clear the Company requires suppliers to provide equal pay for equal work, to introduce measures to ensure equal opportunities throughout all levels of employment and to eliminate health and safety concerns that are particularly prevalent among women workers in its contractual arrangements with suppliers or supplier code of conduct. [Human Rights Statement, 2023: s202.q4cdn.com] • Met: Describes work with suppliers on women's rights: The Human Rights Statement indicates: 'The team partners closely with RISE (Reimagining Industry to Support Equality) to ensure that thousands of working women have access to services to improve their health and finances. In 2022, we partnered with 10 factories and impacted over 12,000-woman workers making Macy's Private Brands sourced through our Private Brands sourcing team. We have set internal targets to forward this work in the coming years'. [Human Rights Statement, 2023: s202.q4cdn.com] <p>Score 2</p> <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.b	Working hours (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"> • Not Met: Requirements on working hours in codes/contracts with suppliers: The Vendor and Supplier Code of Conduct states: 'Suppliers shall not require workers to work more than the regular and overtime hours allowed by the law of the country where the workers are employed. The regular work week shall not exceed 48 hours. Other than in exceptional circumstances, the sum of regular and overtime hours in a week shall not exceed 60 hours. Suppliers shall allow workers at least 24 consecutive hours of rest in every seven-day period. All overtime work shall be consensual. Suppliers shall not request overtime on a regular basis and shall compensate all overtime work at a premium rate'. However, as no information was found regarding the mentioned exceptional circumstances that would allow the working hours in a week to exceed 60 hours. The Company provided feedback to CHRB regarding this indicator, however, key evidence was already in use. The Human Rights Statement indicates: 'The social compliance audit verifies a supplier's compliance with the following areas: [...] Hours of work'. However, no reference to international standards concerning maximum hours and minimum breaks. [Vendor and Supplier Code of Conduct, 29/06/2022: content-az.equisolve.net] & [Human Rights Statement, 2023: s202.q4cdn.com] • Not Met: Describes work with suppliers on working hours: The Human Rights Statement indicates: 'The social compliance audit verifies a supplier's compliance with the following areas: [...] Hours of work'. However, no description found of how it proactively works with suppliers to improve their practices in relation to working hours. [Human Rights Statement, 2023: s202.q4cdn.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of scope of excessive working hours in supply chain • 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		<ul style="list-style-type: none"> Area: Forced Labour, Discrimination Headline: Macy's among companies accused of using suppliers linked to forced labour in China Story: On March 1st., 2020, the Australian Strategic Policy Institute (ASPI) released a report that named Macy's among 83 other companies benefiting from the use of potentially abuse labour transfer programs. <p>According to the report, more than 80,000 Uighur residents and former detainees from the north-western region of Xinjiang, China have been transferred to factories, implicating global supply chains. It is alleged that Muslim minorities are thought to be working in forced labour conditions across the country.</p> <p>The ASPI report said that workers live in segregated dormitories, are required to study Mandarin and undergo ideological training. The workers were transferred out of Xinjiang between 2017 and 2019, claiming that people are being effectively "bought" and "sold" by local governments and commercial brokers. ASPI used open-source public documents, satellite imagery, and media reports and identified 27 factories in nine Chinese provinces that have used labourers.</p> <p>ASPI researchers stated: "This report exposes a new phase in China's social re-engineering campaign targeting minority citizens, revealing new evidence that some factories across China are using forced Uighur labour under a state-sponsored labour transfer scheme that is tainting the global supply chain".</p> <p>The ASPI found links from Macy's to a factory in Xinjiang. [Australian Strategic Policy Institute, 01/03/2020, "Uyghurs for sale": aspi.org.au]</p>
E(1).1	The company has responded publicly to the allegation	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"> Met: Public response: In response to the allegation, the company stated: "We are committed to offering our customers products that are produced ethically and with environmentally responsible materials and processes. As part of this commitment, we are an active member of the American Apparel & Footwear Association (AAFA), among other associations and networks that directly engage with policymakers on international trade, human rights and sustainability issues. Our supplier contract terms and conditions require compliance across the entire supply chain with our Vendor & Supplier Code of Conduct, which explicitly prohibits the use of forced labor. Macy's Code is based on internationally accepted labor standards, including the International Labor Organization's Core Conventions and the Universal Declaration of Human Rights". [Business and Human Rights Resource Centre, 14/09/2022, "Macy's Response": business-humanrights.org] <p>Score 2</p> <ul style="list-style-type: none"> Not Met: Detailed response: The company responded in very general terms and did not address the allegation in detail.
E(1).2	The company has investigated and taken appropriate action	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Not Met: Engaged with stakeholders: The Company provided feedback for this indicator. However, it was not material for the assessment. Not Met: Identified cause <p>Score 2</p> <ul style="list-style-type: none"> Not Met: Identified and implemented improvements: The Company provided feedback for this indicator. However, it was not material for the assessment. Not Met: Stakeholder input to steps taken
E(1).3	The company has engaged with affected stakeholders to provide for or cooperate in remedy(ies)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Not Met: Provided remedy: The Company provided feedback for this indicator. However, it was not material for the assessment. Not Met: Evidence for lack of Impact or link <p>Score 2</p> <ul style="list-style-type: none"> Not Met: Remedy satisfactory to stakeholders: The Company provided feedback for this indicator. However, it was not material for the assessment. Not Met: Remedy delivered: The Company provided feedback for this indicator. However, it was not material for the assessment. Not Met: Independent remedy process used

Indicator Code	Indicator name	Score (out of 2)	Explanation
E(2).0	Serious allegation No 2		<ul style="list-style-type: none"> Area: FoA/CB Headline: Macy's among others accused of anti-union practices in its Indonesian supply chain Story: On July 11, 2022, press sources reported that that anti-union practices were taking place at PT Tainan Enterprises Indonesia, reported to supply brands including Ann Taylor, Gap and Macy's. <p>According to global trade union IndustriAll, when union affiliate Garteks formed a union at the Company's factory in North Jakarta, union president Ahmad Faisal, vice president Tulam and vice secretary Hendra Radista were allegedly dismissed on the pretext of refusing to transfer to a different factory.</p> <p>IndustriAll claimed that Tainan Enterprises Indonesia allegedly concealed the recommendation given by the Indonesian Ministry of Manpower on 24 December 2021 that the three Garteks union leaders should be reinstated: "We urge the company stop deceiving Garteks' members and stop violating national law in place to protect workers from anti-union discrimination. Tainan Enterprises Indonesia should adhere to the Ministry of Manpower's recommendation and reinstate all Garteks members with back pay and seniority", the union added.</p> <p>According to Garteks general secretary, the three dismissed union members have signed a settlement agreement with the company in February 2022, accepting severance pay on the condition that the company stop union busting. However, the union reported that management has continued to persecute union members, claiming "unethical behaviour and that all unionists must be reinstated". [Business and Human Rights and Resource Centre, 22/08/2022, "Indonesia: Garment factory supplying brands incl. Ann Taylor, Gap & Macy's accused of 'union-busting' & called on to reinstate dismissed leaders; incl. co. responses": business-humanrights.org] [IndustriAll, 11/07/2022, "Union busting at Tainan Enterprises Indonesia": industrialunion.org]</p>
E(2).1	The Company has responded publicly to the allegation	1	<p>The individual elements of the assessment are met or not as follows: Score 1</p> <ul style="list-style-type: none"> Met: Public response: The Company provided a response to the Business and Human Rights Resource Centre, stating that it has contacted the supplier upon learning of the allegations. It further states that 'PT Tainan Enterprises Indonesia is working with our third-party social compliance auditor to conduct an anonymous worker sentiment survey per our request. We intend to use these findings as part of our ongoing due diligence, and, if appropriate, require a corrective action plan with this supplier, who has been fully cooperative throughout the process.' [Business and Human Rights Resource Centre, 22/08/2022, "Macy's Response": media.business-humanrights.org] <p>Score 2</p> <ul style="list-style-type: none"> Not Met: Detailed response: In its response the Company does not address the content of the allegation. [Business and Human Rights Resource Centre, 22/08/2022: media.business-humanrights.org]
E(2).2	The company has investigated and taken appropriate action	0.5	<p>The individual elements of the assessment are met or not as follows: Score 1</p> <ul style="list-style-type: none"> Met: Engaged with stakeholders: In the document "Human Rights Statement" the Company presents a case study that, while not naming the individual supplier can be considered sufficiently detailed to be considered addressing this case. The Company states that: 'Considering the inconsistencies between the allegations and the evidence presented, Macy's engaged its auditor to conduct worker surveys and worker interviews. The supplier was informed and agreed to the workers' participation.' [Human Rights Statement, 2023: s202.q4cdn.com] Not Met: Identified cause: The Company indicates in its response that it requested a third-party audit. However, no information was found regarding the outcome of this audit and whether it included findings regarding the underlying causes of the allegation. [Business and Human Rights Resource Centre, 22/08/2022: media.business-humanrights.org] <p>Score 2</p> <ul style="list-style-type: none"> Not Met: Identified and implemented improvements: The company indicates that 'Macy's would highly encourage the factory and its management to undergo training regarding the importance of allowing unrestricted freedom of association'. However, there is no evidence that the company made changes mentioned to its management systems following the events and their human rights impacts. [Human Rights Statement, 2023: s202.q4cdn.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not Met: Stakeholder input to steps taken: The Company stated its intention to use the audit findings which were requested to in part rely on a survey of worker sentiment. However, no further information was found regarding the audit itself or whether the Company acted on the findings. [Business and Human Rights Resource Centre, 22/08/2022: media.business-humanrights.org]
E(2).3	The company has engaged with affected stakeholders to provide for or cooperate in remedy(ies)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Provided remedy • Not Met: Evidence for lack of Impact or link: According to the company: 'Considering the inconsistencies between the allegations and the evidence presented, Macy's engaged its auditor to conduct worker surveys and worker interviews. The supplier was informed and agreed to the workers' participation. During this time, Macy's local sourcing leadership team continued discussions with the supplier. After the investigation, no conclusive evidence was found to support the allegations.' However, the Company found out about an investigation into the supplier by the local government. The information provided by the Company was not sufficient to prove a lack of impact for the affected stakeholders. [Human Rights Statement, 2023: s202.q4cdn.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Remedy satisfactory to stakeholders • Not Met: Remedy delivered • Not Met: Independent remedy process used

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