

Corporate Human Rights Benchmark 2023 Company Scorecard

Company name Prada
Sector Apparel (supply chain and own operations)
Overall score 11.7 out of 100

Theme score	Out of	For theme
2.3	10	A. Governance and Policy Commitments
0.5	25	B. Embedding Respect and Human Rights Due Diligence
5.5	20	C. Remedies and Grievance Mechanisms
1.0	25	D. Performance: Company Human Rights Practices
2.3	20	E. Performance: Responses to Serious Allegations

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

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

Detailed assessment

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

A.1 Policy Commitments (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1.1	Commitment to respect human rights	2	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Met: Universal Declaration of Human rights (UDHR): The Sustainability Policy indicates: 'the Prada Group is committed to operating with full respect for the value of the individual and for the human and workers' rights enshrined in Italian and international covenants and declarations, such as the United Nations Universal Declaration of Human Rights'. [Sustainability Policy, 15/03/2019: pradagroup.com] Score 2 <ul style="list-style-type: none"> Met: Commitment to OECD MNE Guidelines: The Sustainability Policy indicates: 'the Prada Group is committed to operating with full respect for the value of the individual and for the human and workers' rights enshrined in Italian and international covenants and declarations, such as [...] the Organization for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises'. [Sustainability Policy, 15/03/2019: pradagroup.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 <ul style="list-style-type: none"> Met: Commitment to ILO core principles: The Sustainability Policy indicates: 'the Prada Group is committed to operating with full respect for the value of the individual and for the human and workers' rights enshrined in Italian and international covenants and declarations, such as [...] the International Labor Organization (ILO) Declaration on Fundamental Principles and Rights at Work'. [Sustainability Policy, 15/03/2019: pradagroup.com] Met: Explicitly lists all four ILO core principles: The Company's Human Rights Policy covers each ILO Core commitment: discrimination, forced labour, child

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			<p>labour, freedom of association and collective bargaining. As for freedom of association and collective bargaining, it indicates: 'The Group recognizes the right to collective bargaining and to exercise freedom of association of employees. In particular, employees are entitled to the rights to form, participate and organize trade unions to their own will, without fearing to be discriminated, intimidated or retaliated against. The Group commits to engage in open and constructive dialogue with representatives of recognized trade unions, negotiating fairly to ensure mutual success'. The Sustainability policy also states that 'Prada considers unacceptable any form of forced labor or child labor and any type of employment or professional discrimination. It recognizes the right to collective bargaining and to exercise freedom of association both internally and within its sphere of influence throughout the entire value chain'. [Human Rights Policy, 28/07/2022: pradagroup.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Met: Expects suppliers to commit to ILO core principles: The Supplier Code of Conduct has explicit requirements regarding each ILO core area: discrimination, forced labour, child labour, freedom of association and collective bargaining, as indicated below. [Suppliers Code of Conduct, N/A: pradagroup.com] • Met: Explicitly lists all four ILO core principles for suppliers: See above. The statement from the Sustainability policy commitments include the entire value chain. In addition, Supplier Code of Conduct covers child labor, non-discrimination, and forced labour. In relation to freedom of association and collective bargaining, the Company states the following: 'Group suppliers are required to respect their employees' right to form, participate and organize trade unions to their own will, without fearing to be discriminated, intimidated or retaliated against. Suppliers are also required to undertake to maintain an open and constructive dialogue with representatives of recognised trade unions according to applicable regulations, negotiating fairly and respecting trade union role'. [Suppliers Code of Conduct, N/A: pradagroup.com]
A.1.2.b	Commitment to respect the human rights of workers: Health and safety and working hours	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Commitment to respect H&S of workers: The Human Rights Policy indicates: 'Prada is committed to promoting and safeguarding the health and safety of employees and all other workers that are under the operational control of the Group'. [Human Rights Policy, 28/07/2022: pradagroup.com] • Not Met: Commitment to ILO working hours standards or 48 hour regular work week: The Human Rights Policy indicates: 'The Group complies with international and local regulations concerning working hours limits both on a daily and weekly basis. In any case, the sum of the normal working week and overtime hours usually shall not exceed the limits fixed by local labor laws, as well as international labor regulations, unless there are exceptional circumstances. Specifically, overtime shall be included in employment contracts and shall be done on voluntary basis. Nevertheless, Prada guarantees to its employees at least one rest day in seven consecutive working days in accordance, unless there are exceptional circumstances. Collective Bargaining Agreements may provide specific rules to handle peak periods of production or fashion show organization in terms of working hours and define proper compensation to workers'. However, no evidence found of the Company explicitly committing to respect ILO conventions on working hours (the Company refers to international regulations) or that publicly states that workers are not required to work more than 48 hours as regular working week. [Human Rights Policy, 28/07/2022: pradagroup.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Expects suppliers to commit to H&S of workers: The Supplier Code of Conduct indicates: 'Group suppliers are required to maintain responsible behaviour regarding health and safety, in accordance with local and international regulations, ensuring training and information on health and safety regulations to all their employees, as well as appropriate training on the type of activity carried out'. [Suppliers Code of Conduct, N/A: pradagroup.com] • Not Met: Expects suppliers to commit to ILO working hours standards or 48 hour regular work week: The Supplier Code of Conduct indicates: 'Group suppliers are required to comply with local and international regulations on working time limits, including overtime, both on a daily and weekly basis, and to enforce them on their sub-suppliers. In addition, suppliers are required to provide employees with breaks and the minimum number of rest days established by applicable regulations, guaranteeing at least one rest day in seven consecutive working days, except in exceptional circumstances. [...] Group suppliers are also required to pay salaries regularly, to remunerate overtime according to the law'. However, no formal commitment about respecting the ILO conventions on working hours was found.

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			Alternatively, the Company would achieve this by committing to a 48 hours regular working week, and consensual overtime paid at a premium rate. [Suppliers Code of Conduct, N/A: pradagroup.com]
A.1.3.AP	Commitment to respect human rights particularly relevant to the sector – vulnerable groups (AP)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Commitment to women's rights • Not Met: Commitment to children's rights • Not Met: Commitment to migrant worker's rights: The Human Rights Policy indicates: 'Prada recognizes its responsibility, and pays particular attention to more vulnerable workers, such as international or internal migrants or illiterate workers, since their exposure to these risks is higher'. However, although the Company indicates it recognizes and pays more attention to vulnerable workers such as migrants, no evidence found that the Company is committed to respect migrant workers' rights. [Human Rights Policy, 28/07/2022: pradagroup.com] • Not Met: Expects suppliers to respect these rights Score 2 <ul style="list-style-type: none"> • Not Met: Commitment refers to CEDAW/Women's Empowerment Principles • Not Met: Commitment refers to Child Rights Convention/Business Principles • Not Met: Commitment refers to Convention on migrant workers • Not Met: Expects suppliers to respect these rights
A.1.4	Commitment to remedy	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Commitment to remedy adverse HRs impacts • Not Met: Expects suppliers to make this commitment: The Supplier Code of Conduct indicates: 'In the event of non-conformities found during audits, the supplier undertakes to formalise and implement corrective actions to remedy such non-conformities'. However, although the Company indicates suppliers should corrective actions when facing non-compliance, it is not clear that it expects suppliers to remedy the adverse impacts on individuals and workers and communities that it has caused or contributed to beyond audit specific findings, as this subindicator looks for a general commitment to remedy. [Suppliers Code of Conduct, N/A: pradagroup.com] Score 2 <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: As indicated above: 'In the event of non-conformities found during audits, the supplier undertakes to formalise and implement corrective actions to remedy such non-conformities. The Group undertakes to support the supplier, with a view to continuous improvement, in devising and implementing corrective actions'. However, no commitment to work with suppliers to remedy adverse impacts which are directly linked to the company's operations, products or services beyond specific audit findings. [Suppliers Code of Conduct, N/A: pradagroup.com]
A.1.5	Commitment to respect the rights of human rights defenders	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Zero tolerance of threats/attacks on HRDs • Not Met: Expects suppliers to make this commitment Score 2 <ul style="list-style-type: none"> • Not Met: Commitment to working with HRDs to create safe and enabling environment

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.2.1	Commitment from the top	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 Sustainability Committee within the Board, along with the CSR team, will oversee the periodical update of the Policy while the HR department is responsible for monitoring Policy compliance within the Group's own operations. [Human Rights Policy, 28/07/2022: pradagroup.com] • Not Met: Describes HRs expertise of Board member Score 2 <ul style="list-style-type: none"> • Not Met: Board member/CEO signal importance of HRs in their communications
A.2.2	Board responsibility	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Process to review HRs strategy at board level: The Company reports that on July 28, 2022, Board of Directors has approved this Human Rights Policy. The Sustainability Committee within the Board, along with the CSR team, will oversee the periodical update of the Policy. However, no evidence found on the

Indicator Code	Indicator name	Score (out of 2)	Explanation
			processes to discuss and review its human rights policy. [Human Rights Policy, 28/07/2022: pradagroup.com] <ul style="list-style-type: none"> • Not Met: Example of HRs issues/trends discussed in last reporting period Score 2 <ul style="list-style-type: none"> • Not Met: Meets both requirements under score 1 • Not Met: Describes how affected stakeholders / HRs experts inform board discussions
A.2.3	Incentives and performance management	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: At least one board member incentive linked to HRs commitments • Not Met: Incentive scheme linked to key HRs risks beyond employee H&S Score 2 <ul style="list-style-type: none"> • Not Met: Performance criteria linked to HRs made public • Not Met: Review of other board incentives for coherence with HRs policies
A.2.4	Business model strategy and risks	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Board process to review business model and strategy for HRs risks • Not Met: Describes frequency and triggers for reviewing business model Score 2 <ul style="list-style-type: none"> • Not Met: Meets both requirements under score 1 • Not Met: Example of actions resulting from reviews

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

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.1	Responsibility and resources for day-to-day human rights functions	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Score of 1 on A.1.2.a • Not Met: Senior responsibility for HRs implementation and decision making: The Company states that the HR department is responsible for monitoring Policy compliance within the Company's own operations. However, it is not clear what senior management position is responsible for the implementation of human rights commitments. [Human Rights Policy, 28/07/2022: pradagroup.com] Score 2 <ul style="list-style-type: none"> • Not Met: Describes day-to-day responsibility for implementing HRs commitments • Not Met: Day-to-day resources and expertise allocation in own operations • Not Met: Resources and expertise allocation in supply chain
B.1.2	Incentives and performance management	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Senior manager incentives linked to HRs commitments • Not Met: Incentive scheme linked to key HRs risks beyond employee H&S Score 2 <ul style="list-style-type: none"> • Not Met: Performance criteria linked to HRs made public • Not Met: Review of other senior management incentives for coherence with HRs policies
B.1.3	Integration with enterprise risk management	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: HRs risks integrated as part of enterprise risk system: The Company states that 'in 2021, the Prada Group carried out a first high level and qualitative assessment of ESG risks, which were previously identified, according to a broad view of the main sustainability challenges, based on four categories of risks, including compliance risks'. The Company also lists ESG Risk Assessment includes noncompliance with social practices and standards along the supply chain and possible violations of human rights and noncompliance with Human Rights standards for its workers. However, no clear information was found on whether these risks were integrated in the Company's enterprise risk system. [2021 Sustainability Report, 2022: pradagroup.com] Score 2 <ul style="list-style-type: none"> • Not Met: Provides an example • Not Met: Risk assesment by Audit Committee or independent third party
B.1.4.a	Communication /dissemination of policy commitment(s) to workers and	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Score of 1 on A.1.2.a • Not Met: Communicates HRs policies to all workers in own operations: The Company states that 'The Group aims to strengthen human rights values within the organization, for this reason is committed to disseminate human rights principles to

Indicator Code	Indicator name	Score (out of 2)	Explanation
	external stakeholders		its employees through internal communication and with dedicated trainings.' However, no further details on how the policy is communicated and whether the Company takes into account local languages. [Human Rights Policy, 28/07/2022: pradagroup.com] Score 2 <ul style="list-style-type: none"> • Not Met: Communicates HRs policies to stakeholders • Not Met: Example of how HRs policies are accessible for intended audience
B.1.4.b	Communication /dissemination of policy commitment(s) to business relationships	0.5	The individual elements of the assessment are met or not as follows: Score 1 <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 Score 2 <ul style="list-style-type: none"> • Met: Describes how HRs policies are contractual/binding for suppliers: The Company has Supplier Code of Conduct, which includes human rights requirements such as prohibitions of child labour, freedom from forced labour, freedom of association and collective bargaining, etc. The Company states that 'compliance with this Code shall be considered binding as well as any contractual obligations.' [Suppliers Code of Conduct, N/A: pradagroup.com] • Not Met: Requires suppliers to cascade contractual/binding HRs policies to its suppliers
B.1.5	Training on Human Rights	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • 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 has dedicated human rights trainings for its employees, however, no further information found or any details about the training. [Human Rights Policy, 28/07/2022: pradagroup.com] Score 2 <ul style="list-style-type: none"> • Not Met: Trains relevant managers including procurement on HRs
B.1.6	Monitoring and corrective actions	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • 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 that 'in order to ensure compliance with this Policy, the Company commits to set up periodical risk assessment to actively assess and avert potential human rights issues in its operations.' The Company also states in its Supplier Code of Conduct that 'in order to be able to assess compliance with the provisions of this Code, the Group reserves the right to carry out periodic audits of its suppliers and sub suppliers, also through external consultants, in order to verify compliance with the provisions contained herein. In the event of an audit, the supplier undertakes to share with the Group and its designated persons all information and documents necessary for the purpose of the assessment and concerning business relations with the Group itself in a transparent and collaborative manner, as well as to facilitate any access to its own facilities or those of its sub-suppliers, ensuring that the latter also provide such information and documents.' [Human Rights Policy, 28/07/2022: pradagroup.com] & [Suppliers Code of Conduct, N/A: pradagroup.com] Score 2 <ul style="list-style-type: none"> • Not Met: Discloses % of supply chain monitored • Not Met: Describes how workers are involved in monitoring
B.1.7	Engaging and terminating business relationships	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: HRs performance affects selection suppliers • Not Met: HRs performance affects continuation supplier relationships 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

Indicator Code	Indicator name	Score (out of 2)	Explanation
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

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.1	Identifying human rights risks and impacts	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Describes process of identifying risks in own operations • Not Met: Describes process for identifying risks in business relationships 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	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 Company discloses that 'In 2021, the Prada Group carried out a first high-level and qualitative assessment of ESG risks, which were previously identified, according to a broad view of the main sustainability challenges, based on four categories of risks'. It names as the four categories strategic risks, operational risks, financial risks, and compliance risks. However, no details on the process of risk assessment was found. [2021 Sustainability Report, 2022: pradagroup.com] • Not Met: Describes how process applies to supply chain • Not Met: Public disclosure of results of HRs risk assessment: The Company discloses the material topics it has included in its risk assessment. However, it is not clear which of the analysed areas it considers to constitute salient human rights risks. [2021 Sustainability Report, 2022: pradagroup.com] Score 2 <ul style="list-style-type: none"> • Not Met: Meets all requirements under score 1 • Not Met: Describes how assessment involved affected stakeholders
B.2.3	Integrating and acting on human rights risks and impact assessments	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Describes system to prevent, mitigate and remediate HRs issues • Not Met: Describes how global system applies to supply chain • Not Met: Example of actions decided on at least 1 salient HRs issue Score 2 <ul style="list-style-type: none"> • Not Met: Meets all requirements under score 1 • Not Met: Describes how stakeholders involved in decisions about actions taken
B.2.4	Tracking the effectiveness of actions to respond to human rights risks and impacts	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Describes system for evaluation effectiveness of actions • Not Met: Example of lessons learned from evaluation effectiveness of actions Score 2 <ul style="list-style-type: none"> • Not Met: Meets all requirements under score 1 • Not Met: Involves stakeholders in evaluation effectiveness of actions
B.2.5	Communicating on human rights impacts	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Provides two examples of comms with stakeholders Score 2 <ul style="list-style-type: none"> • Not Met: Describes challenges to effective comms and how it is working to address them

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.1	Grievance mechanism(s) for workers	1	<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 states that employees who are aware of perceived violations of its Human Rights Policy should immediately report the incident to the dedicated hotline. 'The Prada Group adopted a web platform (Whispli) managed by a specialized third party, and available in several languages, which ensures full compliance with international privacy regulation and makes possible for the whistleblower to choose anonymity.' [Human Rights Policy, 28/07/2022: pradagroup.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Grievance mechanism available in appropriate languages and workers made aware: The Company states that the hotline for whistleblower is available in several languages. However, there is no information about how the Company ensures that its employees are aware of the hotline and language options. [Human Rights Policy, 28/07/2022: pradagroup.com] • Not Met: Describes how workers in supply chain access grievance mechanism • Not Met: Expects suppliers to convey expectation to their suppliers
C.2	Grievance mechanism(s) for external individuals and communities	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 external individuals and communities: The Company states that its whistleblowing procedure 'shall apply to all Prada Group companies, both in Italy and abroad, to the Prada Group Personnel, stakeholders and other third parties, witnessing an offense or a wrongdoing referable to the Prada Group personnel. The Prada Group Personnel shall mean any persons referable to it, such as directors, executives, other members of the corporate and supervisory bodies, Group management and employees, third parties who are not Group employees such as business partners, clients, suppliers, audit firms, consultants, subjects acting on behalf of the organization, associates, interns, etc.'. The scope of reporting includes violations of its Code of Ethics and human rights, etc. [Whistleblowing Policy, 28/07/2022: pradagroup.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Grievance mechanism available in appropriate languages and affected stakeholders made aware • Met: Describes how external individuals/communities access grievance mechanism: The Company states that its whistleblowing procedure is open for complaints by third parties and includes complaints against business partners and suppliers. [Whistleblowing Policy, 28/07/2022: pradagroup.com] • 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 states that after it receives the complaints, the Ethics Committee analyses the whistleblowing reports received and provides preliminary assessment. After that, the five departments carry out investigation. Following the results, the Ethics Committee shall examine the results and closes the report. However, no evidence found on the time scales for addressing the complaints and how the complainants are informed on the results/process. [Whistleblowing Policy, 28/07/2022: pradagroup.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	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 statement prohibiting retaliation against workers/stakeholders: The Company states that 'Prada shall prohibit and sanction any form of retaliation or discrimination against whistleblowers (as well as anyone who cooperated to assess

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			<p>the reported facts), regardless of whether the report was found to be grounded or not.' [Whistleblowing Policy, 28/07/2022: pradagroup.com]</p> <ul style="list-style-type: none"> • Met: Describes practical measures to prevent retaliation: The Company states that 'if, in particular, the Whistleblower in good faith is an Employee, the Ethics Committee (through the competent company functions) will monitor the Employee's working life for 2 years from the date of the report, to prove the absence of discriminatory actions or other forms of retaliation following the report. If the whistleblower is an employee, he/she may not be dismissed, his/her role cannot be changed, he/she may not be suspended, transferred or subjected to any other organizational measure having direct or indirect negative effects on his/ her working conditions.' Besides, the Company states that 'all Prada Group Personnel involved in various capacities in the management of reports are required to ensure confidentiality over the existence and content of the report, as well as the identity of the Whistleblowers (if known) and Reported Parties. Any disclosure on the existence and content of the report, as well as the identity of the Whistleblowers (if known) and Reported parties, must strictly comply with the "need to know" criterion.' The Company states it accepts anonymous reporting. [Whistleblowing Policy, 28/07/2022: pradagroup.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	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: Describes approach taken to remedy adverse HRs impacts: The Company states that for its employees, it shall provide and (if the conditions are met) adopt disciplinary sanctions against the Reported Party, for the assessed responsibilities. Disciplinary measures will be proportioned to the extent and seriousness of the unlawful conduct ascertained and, in the most serious cases, they may lead to the termination of the employment relationship. Regarding Third Parties (e.g. partners, suppliers, consultants, agents) legal remedies and actions shall apply in addition to the contractual provisions concerning compliance with the Code of Ethics. [Whistleblowing Policy, 28/07/2022: pradagroup.com] • Not Met: Describes how remedy would be provided if no adverse impact identified <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describes changes to systems, processes and practices to prevent future impacts • Not Met: Describes approach to monitoring/implementing agreed remedy • Not Met: Describes approach to learning from incidents if no adverse impacts identified
C.8	Communication on the effectiveness of grievance mechanism(s) and incorporating lessons learned	0	<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.a	Living wage (in own production or manufacturing operations)	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: Pays living wage or sets time-bound target • Not Met: Describes how living wage determined <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Achieved paying a living wage

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not Met: Reviews definition living wage with unions
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: The Company states that 'Group suppliers are required to offer their employees a fair level of remuneration, which reflects each individual's knowledge and skills, avoiding personal and gender bias. Salaries shall be at least the same level as the minimum wage required by national laws and shall represent a living wage for employees.' However, the Company does not have a timebound target for requiring its suppliers to pay at a living wage. It is not clear whether the Company requires suppliers to take into consideration the workers' families or dependents when determining the living wages. [Suppliers Code of Conduct, N/A: pradagroup.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describes work with suppliers on living wage • 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 Company reports that 'In 2022, the Group purchased raw materials from around 480 suppliers, 86% of them located in Italy, around 5% in other European Union countries and the remaining 9% in other non-EU countries.' However, no further details found in regards to the suppliers. [2022 Sustainability Report, 09/03/2023: pradagroup.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 • Not Met: Discloses direct or indirect suppliers involved in higher-risk activities
D.2.4.a	Prohibition of child labour: Age verification and corrective actions (in own production or manufacturing operations)	0.5	<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: Indicates it does not use child labour: The Company states that 'The Group considers unacceptable any form of child labour in its operations. The Group prohibits the employment of young workers who are less than 15 years of age or under the age for completion of compulsory education, whichever is higher. In addition, Prada strictly forbids the involvement of young workers under the age of 18 in hazardous work or under difficult conditions, such as long hours or working at night.' [Human Rights Policy, 28/07/2022: pradagroup.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Age verification of recruited workers • Not Met: Remediation if child labour found in operations
D.2.4.b	Prohibition of child labour: Age verification and corrective actions (in the supply chain)	0	<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 Company states in its Suppliers Code of Conduct that 'Group suppliers are required not to employ young workers who are less than 15 years of age or under the age for completion of compulsory education, whichever is the higher.' However, no information was found on a requirement to verify the workers' age or participation in remediation programs. [Suppliers Code of Conduct, N/A: pradagroup.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describes work with suppliers on eliminating child labour • Not Met: Assessment of scope of child labour in supply chain • Not Met: Analysis of trends demonstrating progress

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.2.5.a	Prohibition of forced labour: Recruitment fees and costs (in own production or manufacturing operations)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Job seekers/workers do not pay recruitment fee • Not Met: Commitment to fully reimburse recruitment fees paid Score 2 <ul style="list-style-type: none"> • Not Met: Describes implementation and monitoring in own operations, incl. service providers
D.2.5.b	Prohibition of forced labour: Recruitment fees and costs (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Requirements on debt/fees in supplier codes and contracts • Not Met: Describes work with suppliers on debt/fees for job seekers/workers Score 2 <ul style="list-style-type: none"> • Not Met: Assessment scope of payment of recruitment fees in supply chain • Not Met: Analysis of trends demonstrating progress
D.2.5.c	Prohibition of forced labour: Wage practices (in own production or manufacturing operations)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Pays workers regularly, in full and on time: The Company states that it recognizes the contribution of its employees by offering a fair level of remuneration, which reflects the knowledge and skills of each individual, avoiding personal bias. However, the Company does not have a commitment to paying workers regularly, in full and on time. [Human Rights Policy, 28/07/2022: pradagroup.com] Score 2 <ul style="list-style-type: none"> • Not Met: Payslip workers shows wages and legitimate deductions • Not Met: Describes implementation and monitoring in own operations, incl. service providers
D.2.5.d	Prohibition of forced labour: Wage practices (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Requirements on paying in full and on time in supplier codes and contracts: The Company states in its Supplier Code of Conduct that 'Group suppliers are required to offer their employees a fair level of remuneration, which reflects each individual's knowledge and skills, avoiding personal and gender bias. Group suppliers are also required to pay salaries regularly, to remunerate overtime according to the law and to comply with all applicable statutory provisions on contribution.' However, the Company has not mentioned paying in full and on time. [Suppliers Code of Conduct, N/A: pradagroup.com] Score 2 <ul style="list-style-type: none"> • Not Met: Describes work with suppliers on paying workers regularly, in full and on time • Not Met: Assessment scope of failure to pay workers in full and on time in supply chain • Not Met: Analysis of trends demonstrating progress
D.2.5.e	Prohibition of forced labour: Restrictions on workers (in own production or manufacturing operations)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Does not retain documents or restrict movement of workers Score 2 <ul style="list-style-type: none"> • Not Met: Describes implementation and monitoring in own operations, incl. service providers
D.2.5.f	Prohibition of forced labour: Restrictions on workers (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Requirements on free movement in supplier codes and contracts • Not Met: Describes working with suppliers on free movement of workers Score 2 <ul style="list-style-type: none"> • Not Met: Assessment of scope of restriction of movement in supply chain • Not Met: Analysis of trends demonstrating progress

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.2.6.a	Freedom of association and collective bargaining (in own production or manufacturing operations)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Commits to measures prohibiting interference with trade unions • Not Met: Discloses % total workforce covered by CB agreements Score 2 <ul style="list-style-type: none"> • Not Met: Meets both requirements under score 1
D.2.6.b	Freedom of association and collective bargaining (in the supply chain)	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Requirements on FoA/CB in suppliers codes and contracts: The Company states in its Supplier Code of Conduct that 'Group suppliers are required to respect their employees' right to form, participate and organize trade unions to their own will, without fearing to be discriminated, intimidated or retaliated against.' [Suppliers Code of Conduct, N/A: pradagroup.com] • Not Met: Describes work with suppliers on FoA/CB Score 2 <ul style="list-style-type: none"> • Not Met: Assessment of scope of restriction of FoA/CB in supply chain • Not Met: Analysis of trends demonstrating progress
D.2.7.a	Health and safety: Fatalities, lost days, injury, occupational disease rates (in own production of manufacturing operations)	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Describes process to identify H&S risks and impacts • Met: Discloses injury rate or lost days for own workers in last reporting period: The Company reports that number of injuries at work was 109 and injury rate was 5.00 in 2022. [2022 Sustainability Report, 09/03/2023: pradagroup.com] • Met: Discloses fatalities for own workers in last reporting period: The Company reports that number of fatal injuries was 0 in 2022. [2022 Sustainability Report, 09/03/2023: pradagroup.com] • Not Met: Discloses occupational disease rate for own workers in last reporting period Score 2 <ul style="list-style-type: none"> • Not Met: Sets targets for H&S performance • Not Met: Met targets or explains why not or how improve H&S management systems
D.2.7.b	Health and safety: Fatalities, lost days, injury, occupational disease rates (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Requirements on H&S in supplier codes and contracts • Not Met: Discloses injury rate or lost days in supply chain in last reporting period • Not Met: Discloses fatalities for workers in supply chain in last reporting period • Not Met: Discloses occupational disease rate in supply chain in last reporting period Score 2 <ul style="list-style-type: none"> • Not Met: Describes work with suppliers of H&S • Not Met: Assessment of scope of H&S issues in supply chain • Not Met: Analysis of trends demonstrating progress
D.2.8.a	Women's rights (in own production or manufacturing operations)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Describes processes to stop harassment and violence against women • Not Met: Working conditions take into account gender issues • Not Met: Measures and steps to address gender pay gap at all levels of employment Score 2 <ul style="list-style-type: none"> • Not Met: Meets all requirements under score 1 • Not Met: Analysis of trends demonstrating progress closing gender pay gap
D.2.8.b	Women's rights (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Requirements on women's rights in contracts/codes with suppliers • Not Met: Describes work with suppliers on women's rights Score 2 <ul style="list-style-type: none"> • Not Met: Assessment of scope of unsafe working conditions/discrimination against women in supply chain • Not Met: Analysis of trends demonstrating progress

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.2.9.a	Working hours (in own production or manufacturing operations)	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: Respects HRs regarding working hours/breaks/rest: The Company states that 'The Group is aware of the importance of work-life balance for its employees, recognizing their right to rest'. Besides, the Company states that 'The Group complies with international and local regulations concerning working hours limits both on a daily and weekly basis. In any case, the sum of the normal working week and overtime hours usually shall not exceed the limits fixed by local labour laws, as well as international labour regulations, unless there are exceptional circumstances. Specifically, overtime shall be included in employment contracts and shall be done on voluntary basis. Nevertheless, Prada guarantees to its employees at least one rest day in seven consecutive working days in accordance, unless there are exceptional circumstances.' However, it is not clear whether the Company always complies with international labour standards. [Human Rights Policy, 28/07/2022: pradagroup.com] • Not Met: Assesses ability of workers to comply with working hours commitments when allocating work <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describes implementation and monitoring in own operations
D.2.9.b	Working hours (in the supply chain)	0	<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 Company states in its Code of Conduct that 'Group suppliers are required to comply with local and international regulations on working time limits, including overtime, both on a daily and weekly basis, and to enforce them on their sub-suppliers. In addition, suppliers are required to provide employees with breaks and the minimum number of rest days established by applicable regulations, guaranteeing at least one rest day in seven consecutive working days, except in exceptional circumstances.' However, it is not clear whether the Company requires suppliers to comply with international labour standards at all times. [Suppliers Code of Conduct, N/A: pradagroup.com] • Not Met: Describes work with suppliers on working hours <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		No allegations meeting the CHRB severity threshold were found, and so the score of 9.34 out of 80 points scored in themes A-D has been applied to produce a score of 2.33 out of 20 points for theme E.

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