

**Corporate Human Rights Benchmark  
2023 Company Scorecard**

**Company name**            Ross Stores  
**Sector**                     Apparel (supply chain only)  
**Overall score**            2.5 out of 100

Theme score	Out of	For theme
0.3	10	A. Governance and Policy Commitments
0.7	25	B. Embedding Respect and Human Rights Due Diligence
1.0	20	C. Remedies and Grievance Mechanisms
0.0	25	D. Performance: Company Human Rights Practices
0.5	20	E. Performance: Responses to Serious Allegations

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

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

**Detailed assessment**

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

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1.1	Commitment to respect human rights	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: General HRs commitment</li> <li>• Not Met: Universal Declaration of Human rights (UDHR)</li> <li>• Not Met: International Bill of Human Rights</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Commitment to UNGPs</li> <li>• Not Met: Commitment to OECD MNE Guidelines</li> </ul>
A.1.2.a	Commitment to respect the human rights of workers: ILO Declaration on Fundamental Principles and Rights at Work	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Commitment to ILO core principles</li> <li>• Not Met: Explicitly lists all four ILO core principles [Code of Business Conduct and Ethics, 03/2023: <a href="https://investors.rossstores.com">investors.rossstores.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Met: Expects suppliers to commit to ILO core principles: The Vendor Code of Conduct, which is inside the Compliance Manual, has explicit requirements regarding each ILO core area: discrimination, forced labour, child labour, freedom of association and collective bargaining, as indicated below. [Vendor Compliance Manual, 01/2023: <a href="https://partners.rossstores.com">partners.rossstores.com</a>]</li> <li>• Met: Explicitly lists all four ILO core principles for suppliers: The Vendor Code of Conduct, which is inside the Compliance Manual, has explicit requirements regarding each ILO core area: discrimination, forced labour, child labour, freedom of association and collective bargaining. As for freedom of association and collective bargaining, it indicates: 'Vendors must recognize and respect rights of</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			workers to freedom of association and collective bargaining’. [Vendor Compliance Manual, 01/2023: <a href="https://partners.rossstores.com">partners.rossstores.com</a> ]
A.1.2.b	Commitment to respect the human rights of workers: Health and safety and working hours	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Commitment to respect H&amp;S of workers: The Code of Business Conduct and Ethics indicates: ‘The Company will not tolerate activity that violates laws, rules, or regulations applicable to the Company, or Ross’ policies. This includes, without limitation, laws, regulations, and policies regarding [...] occupational health and safety [...]’. However, no statement committing it to respect the health and safety of workers found. The 2021 CSR Report states: ‘We are committed to cultivating a safe and secure environment for our Associates and Customers. [...] It is our priority to: Incorporate safety best practices throughout our operations [...]’. However, report content is not considered a suitable source for policy statements under CHRB’s revised approach. Commitments are expected to be placed in formal policy documents. [Code of Business Conduct and Ethics, 03/2023: <a href="https://investors.rossstores.com">investors.rossstores.com</a>] &amp; [CSR 2021, 2022: <a href="https://corp.rossstores.com">corp.rossstores.com</a>]</li> <li>• Not Met: Commitment to ILO working hours standards or 48 hour regular work week</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Expects suppliers to commit to H&amp;S of workers: The Vendor Code of Conduct indicates: ‘Vendors must comply with all applicable, legally mandated standards for workplace health and safety, including but not limited to standards for workplace safety (e.g., applicable workplace or building fire and similar safety codes)’. [Vendor Compliance Manual, 01/2023: <a href="https://partners.rossstores.com">partners.rossstores.com</a>]</li> <li>• Not Met: Expects suppliers to commit to ILO working hours standards or 48 hour regular work week: The Vendor Code of Conduct indicates: ‘Vendors must operate based on prevailing local work hours and observe applicable laws regarding vacation time, leave period, and holidays. Any time worked beyond the norm must be compensated according to local labor laws. [...] Vendors must compensate workers for overtime at legal premium rates. In the absence of such laws [applicable laws], vendors must pay overtime wages at a minimum equal to regular hourly wage rates’. However, no formal commitment about respecting the ILO conventions on working hours was found. Alternatively, the Company would achieve this by committing to a 48 hours regular working week, and consensual overtime paid. at a premium rate. [Vendor Compliance Manual, 01/2023: <a href="https://partners.rossstores.com">partners.rossstores.com</a>]</li> </ul>
A.1.3.AP	Commitment to respect human rights particularly relevant to the sector – vulnerable groups (AP)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Commitment to women's rights</li> <li>• Not Met: Commitment to children's rights</li> <li>• Not Met: Commitment to migrant worker's rights</li> <li>• Not Met: Expects suppliers to respect these rights: Regarding women’s rights, the Vendor Code of Conduct indicates: ‘Vendors must ensure that women are treated equally in all facets of employment’. No specific commitment found to respect women's rights or to CEDAW or WEPs [Vendor Compliance Manual, 01/2023: <a href="https://partners.rossstores.com">partners.rossstores.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Commitment refers to CEDAW/Women's Empowerment Principles</li> <li>• Not Met: Commitment refers to Child Rights Convention/Business Principles</li> <li>• Not Met: Commitment refers to Convention on migrant workers</li> <li>• Not Met: Expects suppliers to respect these rights</li> </ul>
A.1.4	Commitment to remedy	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Commitment to remedy adverse HRs impacts</li> <li>• Not Met: Expects suppliers to make this commitment</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Commitment to collaborate with judicial or non-judicial mechanisms</li> <li>• Not Met: Commitment to work with suppliers on remedy</li> </ul>
A.1.5	Commitment to respect the rights of human rights defenders	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Zero tolerance of threats/attacks on HRDs</li> <li>• Not Met: Expects suppliers to make this commitment</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Commitment to working with HRDs to create safe and enabling environment</li> </ul>

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.2.1	Commitment from the top	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Board level responsibility for HRs</li> <li>• Not Met: Describes HRs expertise of Board member</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Board member/CEO signal importance of HRs in their communications</li> </ul>
A.2.2	Board responsibility	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Process to review HRs strategy at board level</li> <li>• Not Met: Example of HRs issues/trends discussed in last reporting period</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Meets both requirements under score 1</li> <li>• Not Met: Describes how affected stakeholders / HRs experts inform board discussions</li> </ul>
A.2.3	Incentives and performance management	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: At least one board member incentive linked to HRs commitments</li> <li>• Not Met: Incentive scheme linked to key HRs risks beyond employee H&amp;S</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Performance criteria linked to HRs made public</li> <li>• Not Met: Review of other board incentives for coherence with HRs policies</li> </ul>
A.2.4	Business model strategy and risks	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Board process to review business model and strategy for HRs risks</li> <li>• Not Met: Describes frequency and triggers for reviewing business model</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Meets both requirements under score 1</li> <li>• Not Met: Example of actions resulting from reviews</li> </ul>

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

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.1	Responsibility and resources for day-to-day human rights functions	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Score of 1 on A.1.2.a</li> <li>• Not Met: Senior responsibility for HRs implementation and decision making</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Describes day-to-day responsibility for implementing HRs commitments</li> <li>• Not Met: Day-to-day resources and expertise allocation in own operations</li> <li>• Not Met: Resources and expertise allocation in supply chain</li> </ul>
B.1.2	Incentives and performance management	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Senior manager incentives linked to HRs commitments</li> <li>• Not Met: Incentive scheme linked to key HRs risks beyond employee H&amp;S</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Performance criteria linked to HRs made public</li> <li>• Not Met: Review of other senior management incentives for coherence with HRs policies</li> </ul>
B.1.3	Integration with enterprise risk management	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: HRs risks integrated as part of enterprise risk system</li> <li>• Not Met: Provides an example</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Risk assesment by Audit Committee or independent third party</li> </ul>
B.1.4.a	Communication /dissemination of policy commitment(s) to workers and external stakeholders	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Score of 1 on A.1.2.a</li> <li>• Not Met: Communicates HRs policies to all workers in own operations</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Communicates HRs policies to stakeholders</li> <li>• Not Met: Example of how HRs policies are accessible for intended audience</li> </ul>
B.1.4.b	Communication /dissemination of policy	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Met: Meets ILO requirement for suppliers on A.1.2.a</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
	commitment(s) to business relationships		<ul style="list-style-type: none"> <li>• Not Met: Describes steps to communicate HRs policies to supply chain: The Company states, 'Ross communicates its standards and requirements to vendors, buyers and overseas buying agents during our purchasing processes.' However, there is no description of how this is done. Furthermore, no information was found on how the Company communicates its human rights policies down its supply chain. [Product Sourcing and Human Rights, November 2018: <a href="https://rossstores.com">rossstores.com</a>]</li> <li>• Not Met: Requires suppliers to communicate HRs policies</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Describes how HRs policies are contractual/binding for suppliers: The Company states that 'Though Ross does not have direct control over the manufacturing processes for these products, we require suppliers to uphold our ethical standards, both contractually and through enforcement. While Ross orders and imports some products directly through its international buying agents and from manufacturers, they represent the minority of merchandise sold in our stores. For these items, we have additional requirements in place to monitor compliance. Ross' standards and requirements related to sourcing and human rights are incorporated in various Company documents, including Ross' Code of Business Conduct and Ethics, Vendor Compliance Manual, Purchase Orders, Vendor Indemnification Agreements, and Buying Agent Agreements.' [Product Sourcing and Human Rights, November 2018: <a href="https://rossstores.com">rossstores.com</a>]</li> <li>• Not Met: Requires suppliers to cascade contractual/binding HRs policies to its suppliers: The Company states that ' To the extent contractors or subcontractors are involved in the production of goods supplied to Ross, vendors must require that these parties are similarly compliant with Ross' Vendor Code of Conduct.' However, no information was found on whether the same applies to indirect suppliers. [CSR 2021, 2022: <a href="https://corp.rossstores.com">corp.rossstores.com</a>]</li> </ul>
B.1.5	Training on Human Rights	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Score of at least 1 on A.1.2.a</li> <li>• Not Met: Describes how workers are trained on HRs policy commitments: The Company states that 'Ross provides initial training for new buying associates as well as ongoing training and updates to buyers and other associates involved in our product sourcing. Further, Ross' Legal and Transportation departments monitor and assess our supply chain for compliance related to product safety, labor laws, and human trafficking laws.' However, it is not clear if the training is provided for all workers. [Product Sourcing and Human Rights, November 2018: <a href="https://rossstores.com">rossstores.com</a>]</li> <li>• Not Met: Trains relevant managers including procurement on HRs: The Company states that 'Ross provides initial training for new buying associates as well as ongoing training and updates to buyers and other associates involved in our product sourcing. Further, Ross' Legal and Transportation departments monitor and assess our supply chain for compliance related to product safety, labor laws, and human trafficking laws.' However, it is not clear if the training applies to procurement managers as well. [Product Sourcing and Human Rights, November 2018: <a href="https://rossstores.com">rossstores.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Score of 2 on A.1.2.a</li> <li>• Not Met: Meets both requirements under score 1</li> <li>• Not Met: Trains suppliers to meet HRs commitments: The Company states that 'Ross provides initial training for new buying associates as well as ongoing training and updates to buyers and other associates involved in our product sourcing. Further, Ross' Legal and Transportation departments monitor and assess our supply chain for compliance related to product safety, labor laws, and human trafficking laws.' Despite this, the suppliers are not directly connected to the training, but only to the monitoring and the assessment. [Product Sourcing and Human Rights, November 2018: <a href="https://rossstores.com">rossstores.com</a>]</li> <li>• Not Met: Discloses % suppliers trained</li> </ul>
B.1.6	Monitoring and corrective actions	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Score of at least 1 on A.1.2.a</li> <li>• Not Met: Monitors implementation of HRs policy commitments across global ops and supply chain: The Company states that 'We closely monitor evolving issues throughout the world to promote adherence by our suppliers and business partners to our policies and commitments, as well as to federal, state, and local laws.' And, it states that 'we monitor and assess our supply chain for compliance related to product safety, labor laws, and human-trafficking concerns.' However, no information was found on the Company's own operations. [CSR 2021, 2022: <a href="https://corp.rossstores.com">corp.rossstores.com</a>]</li> <li>• Not Met: Discloses % of supply chain monitored</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Not Met: Describes how workers are involved in monitoring</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Score of 2 on A.1.2.a</li> <li>• Not Met: Describes corrective actions process</li> <li>• Not Met: Discloses findings and number of correction action processes</li> </ul>
B.1.7	Engaging and terminating business relationships	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: HRs performance affects selection suppliers</li> <li>• Met: HRs performance affects continuation supplier relationships: The Company states that 'If Ross becomes aware that any vendor has been found to be out of compliance with Ross' requirements or procedures regarding the above, including any applicable local, national, or international labor or human trafficking laws, Ross will take appropriate responsive action, which could include suspending all shipments of a vendor's merchandise and terminating the business relationship.'                [Product Sourcing and Human Rights, November 2018: <a href="https://www.rossstores.com">rossstores.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Describes positive HRs incentives for business relationships</li> <li>• Not Met: Works with suppliers to meet HRs requirements</li> </ul>
B.1.8	Approach to engagement with affected stakeholders	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Describes how workers and communities identified and engaged in the last two years</li> <li>• Not Met: Discloses stakeholders whose HRs may be affected</li> <li>• Not Met: Provides two examples of engagement with stakeholders</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Analysis of stakeholder views on company's HRs issues</li> <li>• Not Met: Describes how stakeholder views influenced company's HRs approach</li> </ul>

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.1	Identifying human rights risks and impacts	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Describes process of identifying risks in own operations</li> <li>• Not Met: Describes process for identifying risks in business relationships</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Describes global risk identification system incl. stakeholder consultation</li> <li>• Not Met: Describes how risk identification system is triggered by new circumstances</li> <li>• Not Met: Describes risks identified in relation to new circumstances</li> </ul>
B.2.2	Assessing human rights risks and impacts	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Describes assessment process and discloses salient HRs risks</li> <li>• Not Met: Describes how process applies to supply chain</li> <li>• Not Met: Public disclosure of results of HRs risk assessment</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Meets all requirements under score 1</li> <li>• Not Met: Describes how assessment involved affected stakeholders</li> </ul>
B.2.3	Integrating and acting on human rights risks and impact assessments	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Describes system to prevent, mitigate and remediate HRs issues</li> <li>• Not Met: Describes how global system applies to supply chain</li> <li>• Not Met: Example of actions decided on at least 1 salient HRs issue</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Meets all requirements under score 1</li> <li>• Not Met: Describes how stakeholders involved in decisions about actions taken</li> </ul>
B.2.4	Tracking the effectiveness of actions to respond to human rights risks and impacts	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Describes system for evaluation effectiveness of actions</li> <li>• Not Met: Example of lessons learned from evaluation effectiveness of actions</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Meets all requirements under score 1</li> <li>• Not Met: Involves stakeholders in evaluation effectiveness of actions</li> </ul>
B.2.5	Communicating on human rights impacts	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Provides two examples of comms with stakeholders: The Company states that 'To start, we communicate our standards and requirements, and provide training to vendors, buyers, and overseas buying agents during our</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>purchasing processes. We provide initial training to new Associates as well as ongoing training and updates to buyers and other Associates involved in our product sourcing. [...] In addition, we maintain a factory audit program intended to promote compliance with our Vendor Code of Conduct, which includes adherence to local labor, safety, and environmental laws. The program employs numerous resources, including buying agent-conducted factory inspections and third-party factory audits conducted by industry-leading auditors.' However, no specific examples of communication with stakeholders were found. [CSR 2021, 2022: <a href="http://corp.rossstores.com">corp.rossstores.com</a>]</p> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Describes challenges to effective comms and how it is working to address them</li> </ul>

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.1	Grievance mechanism(s) for workers	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Grievance mechanism accessible to all workers: The Company states that 'The Company has established a procedure to allow employees, customers, or business partners to submit complaints on a confidential and anonymous basis. Complaints can be submitted (on an anonymous basis, if desired) by: Calling the Company-sponsored Alertline at 1-800-93-ALERT (accessible 24 hours a day, 7 days a week); Submitting the complaint in writing to the Legal Department [...] [Whistle Blowing and Complaint Policy and Procedures, 13/3/2019: <a href="http://investors.rossstores.com">investors.rossstores.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Grievance mechanism available in appropriate languages and workers made aware</li> <li>• Not Met: Describes how workers in supply chain access grievance mechanism: The Company states that the procedure is open to employees, customers, and business partners. It is unclear if workers of business partners have access to the procedure as well. [Whistle Blowing and Complaint Policy and Procedures, 13/3/2019: <a href="http://investors.rossstores.com">investors.rossstores.com</a>]</li> <li>• Not Met: Expects suppliers to convey expectation to their suppliers</li> </ul>
C.2	Grievance mechanism(s) for external individuals and communities	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Grievance mechanism accessible to all external individuals and communities: The Company states that 'The Company has established a procedure to allow employees, customers, or business partners to submit complaints on a confidential and anonymous basis.' however, it is not clear if external individuals and communities also have access. [Whistle Blowing and Complaint Policy and Procedures, 13/3/2019: <a href="http://investors.rossstores.com">investors.rossstores.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Grievance mechanism available in appropriate languages and affected stakeholders made aware</li> <li>• Not Met: Describes how external individuals/communities access grievance mechanism [Whistle Blowing and Complaint Policy and Procedures, 13/3/2019: <a href="http://investors.rossstores.com">investors.rossstores.com</a>]</li> <li>• Not Met: Expects supplier to convey expectation to their suppliers</li> </ul>
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"> <li>• Not Met: Describes how users engaged on design and performance</li> <li>• Not Met: Provides user engagement examples (at least two) on design and performance</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Describes how users engaged on improvement of mechanism</li> <li>• Not Met: Provides user engagement examples (at least two) on improvement</li> </ul>
C.4	Procedures related to the mechanism(s) are equitable, publicly available and explained	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Describes procedure and timescales for managing complaints or concerns: The Company states that 'Any complaint submitted in accordance with this Policy will be immediately directed to the Legal Department. The Legal Department will promptly review the complaint and assign a qualified person to investigate. Complaints concerning the Legal Department will be forwarded immediately to the Chair of the Audit Committee of the Board of Directors for investigation/assignment. Unless otherwise directed by the Legal Department, the person assigned the investigation shall conduct an appropriate investigation and submit a written report of his or her findings and recommendations to the Legal</li> </ul>



Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Department within thirty (30) days after the date of assignment, or as soon as reasonably practical. The Company shall make available appropriate resources in support of each assignment and shall take appropriate responsive action. The Legal Department/Management will regularly notify the Audit Committee of complaints, and the results of related investigations, which the General Counsel deems to be significant to the Audit Committee's performance of its duties. The term "significant" generally will include, but not be limited to, valid complaints or allegations regarding the Company's accounting practices, alleged fraud, internal controls, financial reporting, auditing matters, deceptive practices, alleged executive misconduct, or related matters.' However, it is also not clear if this applies to external individuals and communities as well' [Whistle Blowing and Complaint Policy and Procedures, 13/3/2019: <a href="http://investors.rossstores.com">investors.rossstores.com</a>]</p> <ul style="list-style-type: none"> <li>• Not Met: Describes technical, financial, advisory support to enable equal access</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Describe types of outcome to complainant through use of mechanism</li> <li>• Not Met: Describes escalation to senior levels / independent adjudicators: The Company states that 'Complaints concerning the Legal Department will be forwarded immediately to the Chair of the Audit Committee of the Board of Directors for investigation/assignment.' However, it is not clear if it is possible in general to escalate grievances. [Whistle Blowing and Complaint Policy and Procedures, 13/3/2019: <a href="http://investors.rossstores.com">investors.rossstores.com</a>]</li> </ul>
C.5	Prohibition of retaliation for raising complaints or concerns	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Public statement prohibiting retaliation against workers/stakeholders: The Company states that 'It is a violation of federal law to retaliate against any person who provides truthful information to a law enforcement official concerning a possible violation of any federal law. Moreover, the Company will not tolerate any form of retaliation, harassment, or intimidation by any officer, associate, employee, contractor, subcontractor, or agent of the Company against an employee because the employee has: Submitted a complaint under this Policy; Provided information, caused information to be provided, or otherwise assisted in an investigation regarding any conduct which the employee reasonably believes constitutes a violation of laws, rules, regulations, or Company policies; or Commenced, caused to be commenced, testified, participated or otherwise assisted in, a proceeding or investigation relating to an alleged violation of any law, rule, regulation, or Company policy.' However, it is not clear if the prohibition of retaliation also applies to external individuals or communities. [Whistle Blowing and Complaint Policy and Procedures, 13/3/2019: <a href="http://investors.rossstores.com">investors.rossstores.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Specifies no legal action, firing or violence: The Company states that 'Prohibited forms of retaliation, harassment, or intimidation include, but are not limited to, discharge, demotion, suspension, threats, harassment, or any other manner of discrimination with respect to an associate's terms or conditions of employment. Employees who engage in any such prohibited conduct in violation of this Policy will be subject to discipline, up to and including termination.' However, it is not clear if this applies to external individuals or communities. [Whistle Blowing and Complaint Policy and Procedures, 13/3/2019: <a href="http://investors.rossstores.com">investors.rossstores.com</a>]</li> <li>• Not Met: Expects suppliers to prohibit retaliation against workers/stakeholders</li> </ul>
C.6	Company involvement with state-based judicial and non-judicial grievance mechanisms	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Complainants not asked to waive legal rights</li> <li>• Not Met: Does not require confidentiality provisions</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Cooperates with state based non judicial mechanisms</li> <li>• Not Met: Example of issue resolved (if applicable)</li> </ul>
C.7	Remedying adverse impacts	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Describes approach taken to remedy adverse HRs impacts</li> <li>• Not Met: Describes how remedy would be provided if no adverse impact identified</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Describes changes to systems, processes and practices to prevent future impacts</li> <li>• Not Met: Describes approach to monitoring/implementing agreed remedy</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Not Met: Describes approach to learning from incidents if no adverse impacts identified</li> </ul>
C.8	Communication on the effectiveness of grievance mechanism(s) and incorporating lessons learned	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Discloses number of grievances filed, addressed or resolved and outcomes achieved</li> <li>• Not Met: Example of how lessons from mechanism improved HRs management system</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Describes process to evaluate mechanism and changes made as a result</li> <li>• Not Met: Describes procedures to address delays of outcomes agreed with stakeholders</li> </ul>

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.2.1.b	Living wage (in the supply chain)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Requirements on living wage in supplier codes and contracts</li> <li>• Not Met: Describes work with suppliers on living wage</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Assessment of scope of payment below living wage in supply chain</li> <li>• Not Met: Analysis of trends demonstrating progress</li> </ul>
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"> <li>• Not Met: Describes practices to avoid price or short notice requirements that undermine HRs</li> <li>• Not Met: Describes practices to pay suppliers in line with agreed timeframes</li> <li>• Not Met: Reviews own operations to mitigate negative impact of purchasing practices</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Meets all requirements under score 1</li> <li>• Not Met: Example of assessing and changing of purchasing practices</li> </ul>
D.2.3	Mapping and disclosing the supply chain	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Identifies direct and indirect suppliers including manufacturing sites</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Discloses names and locations of significant parts of supply chain and how significance was defined</li> <li>• Not Met: Discloses direct or indirect suppliers involved in higher-risk activities</li> </ul>
D.2.4.b	Prohibition of child labour: Age verification and corrective actions (in the supply chain)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Requirements on child labour in supplier codes and contracts: The Company states in its Code of Business Conduct and Ethics that 'This Code applies to all members of the Board of Directors, officers, associates and agents, wherever located and whether working for the Company on a full or part-time basis (such individuals will be referred to as "Associate(s)" in this Code). In addition, Ross' business partners (including but not limited to suppliers, vendors, service providers, and other individuals or businesses with whom the Company interacts in the course of its business) are also expected to comply with applicable standards set forth in this Code.' And, it also states that 'Vendors, manufacturers, and other business partners of the Company must strictly comply with all applicable federal, state, local, and international laws relating to the manufacture and production of products sold to the Company, including compliance with all applicable laws relating to [...] child labor.' However, no information was found regarding age verification processes or remediation programs. [Code of Business Conduct and Ethics, 03/2023: <a href="https://investors.rossstores.com">investors.rossstores.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Describes work with suppliers on eliminating child labour</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Assessment of scope of child labour in supply chain</li> <li>• Not Met: Analysis of trends demonstrating progress</li> </ul>
D.2.5.b	Prohibition of forced labour: Recruitment fees and costs (in the supply chain)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Requirements on debt/fees in supplier codes and contracts</li> <li>• Not Met: Describes work with suppliers on debt/fees for job seekers/workers</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Assessment scope of payment of recruitment fees in supply chain</li> <li>• Not Met: Analysis of trends demonstrating progress</li> </ul>



Indicator Code	Indicator name	Score (out of 2)	Explanation
D.2.5.d	Prohibition of forced labour: Wage practices (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Requirements on paying in full and on time in supplier codes and contracts</li> <li>• Not Met: Describes work with suppliers on paying workers regularly, in full and on time</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Assessment scope of failure to pay workers in full and on time in supply chain</li> <li>• Not Met: Analysis of trends demonstrating progress</li> </ul>
D.2.5.f	Prohibition of forced labour: Restrictions on workers (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Requirements on free movement in supplier codes and contracts</li> <li>• Not Met: Describes working with suppliers on free movement of workers</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Assessment of scope of restriction of movement in supply chain</li> <li>• Not Met: Analysis of trends demonstrating progress</li> </ul>
D.2.6.b	Freedom of association and collective bargaining (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Requirements on FoA/CB in suppliers codes and contracts: The Company states that 'Vendors must recognize and respect rights of workers to freedom of association and collective bargaining.' However, no information was found on prohibitions of intimidation, harassment, retaliation and violence against union members and representatives. [Vendor Compliance Manual, 01/2023: <a href="https://partners.rossstores.com">partners.rossstores.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Describes work with suppliers on FoA/CB</li> <li>• Not Met: Assessment of scope of restriction of FoA/CB in supply chain</li> <li>• Not Met: Analysis of trends demonstrating progress</li> </ul>
D.2.7.b	Health and safety: Fatalities, lost days, injury, occupational disease rates (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Requirements on H&amp;S in supplier codes and contracts: The Company states that 'Vendors must comply with all applicable, legally mandated standards for workplace health and safety, including but not limited to standards for workplace safety (e.g., applicable workplace or building fire and similar safety codes).' However, no clear requirements were found. [Vendor Compliance Manual, 01/2023: <a href="https://partners.rossstores.com">partners.rossstores.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Discloses injury rate or lost days in supply chain in last reporting period</li> <li>• Not Met: Discloses fatalities for workers in supply chain in last reporting period</li> <li>• Not Met: Discloses occupational disease rate in supply chain in last reporting period</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Describes work with suppliers of H&amp;S</li> <li>• Not Met: Assessment of scope of H&amp;S issues in supply chain</li> <li>• Not Met: Analysis of trends demonstrating progress</li> </ul>
D.2.8.b	Women's rights (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Requirements on women's rights in contracts/codes with suppliers: The Company states that 'Vendors must ensure that women are treated equally in all facets of employment.' However, no requirements to introduce measures to ensure equal opportunities and to eliminate health and safety concerns particularly prevalent among women workers were found. [Vendor Compliance Manual, 01/2023: <a href="https://partners.rossstores.com">partners.rossstores.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Describes work with suppliers on women's rights</li> <li>• Not Met: Assessment of scope of unsafe working conditions/discrimination against women in supply chain</li> <li>• Not Met: Analysis of trends demonstrating progress</li> </ul>
D.2.9.b	Working hours (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Requirements on working hours in codes/contracts with suppliers: The Company states that 'Vendors must operate based on prevailing local work hours and observe applicable laws regarding vacation time, leave period, and holidays. Any time worked beyond the norm must be compensated according to local labor laws.' However, no evidence was found that the Company is requiring suppliers to comply with international standards. [Vendor Compliance Manual, 01/2023: <a href="https://partners.rossstores.com">partners.rossstores.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Describes work with suppliers on working hours</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			Score 2 <ul style="list-style-type: none"> <li>• Not Met: Assessment of scope of excessive working hours in supply chain</li> <li>• Not Met: Analysis of trends demonstrating progress</li> </ul>

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
E(1).0	Serious allegation No 1		No allegations meeting the CHRB severity threshold were found, and so the score of 1.99 out of 80 points scored in themes A-D has been applied to produce a score of 0.50 out of 20 points for theme E.

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