

**Corporate Human Rights Benchmark
2023 Company Scorecard**

Company name SHEIN
Sector Apparel (supply chain only)
Overall score 3.8 out of 100

Theme score	Out of	For theme
0.9	10	A. Governance and Policy Commitments
0.9	25	B. Embedding Respect and Human Rights Due Diligence
0.0	20	C. Remedies and Grievance Mechanisms
1.2	25	D. Performance: Company Human Rights Practices
0.8	20	E. Performance: Responses to Serious Allegations

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

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

Detailed assessment

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

A.1 Policy Commitments (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1.1	Commitment to respect human rights	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Met: General HRs commitment: The Human rights policy states that 'We are committed to honoring and protecting the rights of our employees and supporting our suppliers to protect the rights of their own workers. We have aligned our Human Rights Policy (the "Policy") with the international principles described in the United Nations' Universal Declaration on Human Rights (UNDHR) as well as with the laws and requirements established in the countries where SHEIN and our suppliers operate'. [Human Rights Policy, 09/2022: sheingroup.com] Not Met: International Bill of Human Rights Score 2 <ul style="list-style-type: none"> Not Met: Commitment to UNGPs: The Company has provided comments to CHRB regarding this subindicator. However, veidence was not material. Not Met: Commitment to OECD MNE Guidelines
A.1.2.a	Commitment to respect the human rights of workers: ILO Declaration on Fundamental Principles and Rights at Work	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not Met: Commitment to ILO core principles Not Met: Explicitly lists all four ILO core principles: The Human Rights policy indicates: 'Rejecting forced labor, harassment, discrimination, and unsafe working conditions for our employees. We do not employ children or prison laborers. We respect our employees' rights of assembly, speech, self-expression, association, and freedom from unlawful discrimination'. However, no explicit commitment to respect the right to collective bargaining found. [Human Rights Policy, 09/2022: sheingroup.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<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. [Supplier Code of Conduct, N/A: sheingroup.com] • Met: Explicitly lists all four ILO core principles for suppliers: 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 for freedom of association and collective bargaining it adds: 'The supplier partner shall respect employees' freedom of association and the right to collective bargaining between employees and management. Employees have the right to form and join trade unions and other workers' organizations of their own choosing, and they shall not be subject to any harassment, interference or retaliation for the foregoing actions'. [Supplier Code of Conduct, N/A: sheingroup.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 Workplace Health & Safety Statement indicates: 'SHEIN is committed to providing a healthy and safety work environment for all our employees, and to safeguarding workers' rights under the law of the countries where it operates. SHEIN provides health and wellness support, which may take the form of trainings, benefits, and/or other resources, to its employees to promote awareness. SHEIN also works hard to identify potential risks to the health and safety of its staff and mitigate those risks in a timely manner with consideration of respected guidance on the given matter'. [Workplace Health & Safety Statement, 09/2022: sheingroup.com] • Not Met: Commitment to ILO working hours standards or 48 hour regular work week <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: 'The supplier partner shall provide a safe, hygienic and healthy workplace environment, and take necessary measures to prevent employees from accidents and injuries arising out of, or related to, work in the course of their services'. [Supplier Code of Conduct, N/A: sheingroup.com] • Not Met: Expects suppliers to commit to ILO working hours standards or 48 hour regular work week: The Supplier Code of Conduct indicates: 'The supplier partner shall arrange working hours reasonably and shall comply with local laws and regulations. Agreement between employee and supplier on working hours shall be agreed upon transparently with the employee before starting employment. [...] The supplier partner shall [...] comply with the legal requirements for overtime compensation'. 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. [Supplier Code of Conduct, N/A: sheingroup.com]
A.1.3.AP	Commitment to respect human rights particularly relevant to the sector – vulnerable groups (AP)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Commitment to women's rights: The Diversity, Equity and Inclusion statement indicates that 'SHEIN employees are given equal employment and promotion opportunities. Our intent is to create a workplace that is welcoming and inclusive for people from any national or cultural background, any gender or sexual identity, any level of disability, any religious belief and any race or ethnic identity.' However, this sub-indicator looks for an explicit statement committing to respect women's rights. [Diversity, Equity and Inclusion Statement, 09/2022: sheingroup.com] • Not Met: Commitment to children's rights: The Responsible sourcing policy includes a prohibition of child labour. However, this subindicator looks for a formal commitment to respect children's rights. [Responsible Sourcing Policy, N/A: sheingroup.com] • Not Met: Commitment to migrant worker's rights • Not Met: Expects suppliers to respect these rights <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Commitment refers to CEDAW/Women's Empowerment Principles • Not Met: Commitment refers to Child Rights Convention/Business Principles • Not Met: Commitment refers to Convention on migrant workers • Not Met: Expects suppliers to respect these rights
A.1.4	Commitment to remedy	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Commitment to remedy adverse HRs impacts

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not Met: Expects suppliers to make this commitment: The Supplier Code of Conduct indicates: 'If the supplier partner fails to remediate within a reasonable time or refuses to rectify after receiving the remediation notice from the Customer, the Customer has the right to unilaterally cancel the order and/or immediately terminate all business cooperation with the supplier partner, and the Customer should not, as a result of the aforementioned cancellation of orders or termination of cooperation, be liable for any form of breach of contract, infringement or damages'. However, no evidence found that it expects its suppliers to commit it to remedy the adverse impacts on individuals and workers and communities that it has caused or contributed to. [Supplier Code of Conduct, N/A: sheingroup.com] Score 2 • Not Met: Commitment to collaborate with judicial or non-judicial mechanisms • Not Met: Commitment to work with suppliers on remedy
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"> • Not Met: Zero tolerance of threats/attacks on HRDs • Not Met: Expects suppliers to make this commitment <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Commitment to working with HRDs to create safe and enabling environment

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.2.1	Commitment from the top	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Board level responsibility for HRs: The Company states that 'Our Executive Leadership team is responsible for this Policy, and it receives regular updates on our commitments to advancing human rights and—through the SRS—our suppliers' related efforts.' However, it is not clear whether this team is placed at board level. [Human Rights Policy, 09/2022: sheingroup.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describes HRs expertise of Board member • Not Met: Board member/CEO signal importance of HRs in their communications
A.2.2	Board responsibility	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Process to review HRs strategy at board level • Not Met: Example of HRs issues/trends discussed in last reporting period <p>Score 2</p> <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	<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: At least one board member incentive linked to HRs commitments: Annex 3 of Shein ESG Report discloses: 'The Global Head of ESG, Adam Whinston is responsible for providing technical advice to the highest ESG governance body, the CEO [...] Mr. Whinston's compensation in the form of bonus is tied to ESG performance indicators.' However, this sub-indicator looks for evidence that at least one member of the Supervisory Board has an incentive scheme linked to the Company's human rights commitments. In addition, current evidence refers to senior executive level. [Shein GRI Index 2022, 2023: sheingroup.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Incentive scheme linked to key HRs risks beyond employee H&S • 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	<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: Board process to review business model and strategy for HRs risks • Not Met: Describes frequency and triggers for reviewing business model <p>Score 2</p> <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	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Score of 1 on A.1.2.a • Not Met: Senior responsibility for HRs implementation and decision making: The Company states that 'SHEIN's Executive Leadership team is also responsible for implementing this Policy, and tracking its implementation.' However, it is not clear what the responsibilities of this team are. It also indicates that 'The Global Head of ESG, Adam Whinston is responsible for providing technical advice to the highest ESG governance body, the CEO.' However, being a CEO the only Senior Executive pointed out as responsible for implementation and decision making on human rights within a Company is not considered sufficient by CHRB methodology, as the CEO already holds different responsibilities. [Human Rights Policy, 09/2022: sheingroup.com] & [Shein GRI Index 2022, 2023: sheingroup.com] <p>Score 2</p> <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	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Senior manager incentives linked to HRs commitments • Not Met: Incentive scheme linked to key HRs risks beyond employee H&S <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Performance criteria linked to HRs made public • Not Met: Review of other senior management incentives for coherence with HRs policies
B.1.3	Integration with enterprise risk management	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: HRs risks integrated as part of enterprise risk system • Not Met: Provides an example <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Risk assesment by Audit Committee or independent third party
B.1.4.a	Communication /dissemination of policy commitment(s) to workers and external stakeholders	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Score of 1 on A.1.2.a • Not Met: Communicates HRs policies to all workers in own operations: The Company states that employees 'certify to an employee handbook which contains [...] our Code of Ethics' However, it is not clear whether the Company takes into account relevant local languages when communicating its policies to the employees. It is also not clear whether the Company communicates its policies to all its workers. The Company has provided comments to CHRB regarding this indicator. However, this document or its content has not been found in publicly available sources. [2021 Sustainability and Social Impact Report, 31/12/2021: sheingroup.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Communicates HRs policies to stakeholders • Not Met: Example of how HRs policies are accessible for intended audience
B.1.4.b	Communication /dissemination of policy commitment(s) to business relationships	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Meets ILO requirement for suppliers on A.1.2.a • Not Met: Describes steps to communicate HRs policies to supply chain: The Company states that all its suppliers must sign the Company's supplier code of conduct and affirm their commitment to it. However, no information was found regarding steps taken beyond the first tier of the supply chain. [Human Rights Policy, 09/2022: sheingroup.com] • Not Met: Requires suppliers to communicate HRs policies <p>Score 2</p> <ul style="list-style-type: none"> • Met: Describes how HRs policies are contractual/binding for suppliers: The Company states that 'We have a zero-tolerance policy for child labor, human trafficking, and migrant forced labor. SHEIN's Supplier Code of Conduct states each of these commitments clearly, and all our suppliers must sign it and affirm their commitment to our Supplier Code of Conduct if they wish to work with us.' It also states that 'Our SHEIN Responsible Sourcing (SRS) evaluation system requires regular audits of our primary suppliers against leading industry standards and best

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>practices, including the human rights objectives outline here and in our Supplier Code of Conduct. [...] The results of the SRS assessment are shared with our suppliers to encourage continuous improvement.</p> <p>The SRS system also flags zero-tolerance violations of our Supplier Code of Conduct and this Policy. If such violations are identified, SHEIN will terminate its relationship with the supplier unless the supplier takes immediate, appropriate remedial action.' [Human Rights Policy, 09/2022: sheingroup.com]</p> <ul style="list-style-type: none"> • Not Met: Requires suppliers to cascade contractual/binding HRs policies to its suppliers
B.1.5	Training on Human Rights	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Score of at least 1 on A.1.2.a • Not Met: Describes how workers are trained on HRs policy commitments: SHEIN Sustainability report discloses: 'The SRS [SHEIN Responsible Sourcing] program is managed by our ESG team but SHEIN also trains staff from other departments to work to extend responsibility to our own company. To date, over 477 SHEIN staff members have completed best-practice training on how to screen, evaluate and choose suppliers that will meet our standards.' Nonetheless, it's not evident whether the Company conducts training on its own human rights commitments towards its employees. [2022 Sustainability and Social Impact Report, 2023: sheingroup.com] • Met: Trains relevant managers including procurement on HRs: SHEIN Sustainability report discloses: 'The SRS [SHEIN Responsible Sourcing] program is managed by our ESG team but SHEIN also trains staff from other departments to work to extend responsibility to our own company. To date, over 477 SHEIN staff members have completed best-practice training on how to screen, evaluate and choose suppliers that will meet our standards.' [2022 Sustainability and Social Impact Report, 2023: sheingroup.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Score of 2 on A.1.2.a • Not Met: Meets both requirements under score 1 • Not Met: Trains suppliers to meet HRs commitments • Not Met: Discloses % suppliers trained
B.1.6	Monitoring and corrective actions	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Score of at least 1 on A.1.2.a • Not Met: Monitors implementation of HRs policy commitments across global ops and supply chain: The SHEIN Sustainability Report states: 'The SRS audit is an assessment conducted to evaluate a supplier's performance in terms of their processes, capabilities and adherences to the SHEIN Supplier Code of Conduct and SHEIN Responsible Sourcing (SRS) Policy. The SRS audit is carried out either by a third-party verification agency hired by the company or carried out by the company itself'. No evidence was found regarding the Company monitoring its own operations. [2022 Sustainability and Social Impact Report, 2023: sheingroup.com] • Not Met: Discloses % of supply chain monitored: The SHEIN Sustainability Report discloses: 'In 2022, SHEIN conducted 2812 total SRS audits. This included 2,425 audits covering 1,941 contract manufacturers which accounted for approximately 84% of SHEIN-branded products by procurement value for 2022. It also conducted 387 other SRS audits of textile and packaging suppliers and providers of other ancillary services, such as warehousing facilities'. However, it is not clear the proportion of the total suppliers that were monitored. [2022 Sustainability and Social Impact Report, 2023: sheingroup.com] • Not Met: Describes how workers are involved in monitoring <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Score of 2 on A.1.2.a • Not Met: Describes corrective actions process: The SHEIN Sustainability Report states: 'When ZTVs [Zero Tolerance Violations] are discovered, SHEIN assigns an SRS facilitator to oversee the correction process and verify remediation of the issue, providing support through training and investment on a case-by-case basis. Unannounced follow-up audits are conducted to support continuous improvement of our supply chain. To date, all identified ZTVs have been remediated within the required timelines as set out in the SRS Policy or the partnership has been terminated'. However, no further details found on the specific steps it follows as part of the corrective action process. In addition, evidence seems to refer only to cases of 'zero tolerance violations'. [2022 Sustainability and Social Impact Report, 2023: sheingroup.com] • Not Met: Discloses findings and number of correction action processes: The SHEIN Sustainability Report states: 'To date, all identified ZTVs have been

Indicator Code	Indicator name	Score (out of 2)	Explanation
			remediated within the required timelines as set out in the SRS Policy or the partnership has been terminated'. Additionally, a graphical representation reveals the proportion of monitored suppliers that exhibited ZTVs. However, it is not clear, the quantity of corrective action plans taken by the Company. [2022 Sustainability and Social Impact Report, 2023: sheingroup.com]
B.1.7	Engaging and terminating business relationships	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: HRs performance affects selection suppliers: The Company states 'We have a zero-tolerance policy for child labor, human trafficking, and migrant forced labor. SHEIN's Supplier Code of Conduct states each of these commitments clearly, and all our suppliers must sign it and affirm their commitment to our Supplier Code of Conduct if they wish to work with us.' However, no information was found as to whether this impacts the identification and selection processes of business partners. [Human Rights Policy, 09/2022: sheingroup.com] • Met: HRs performance affects continuation supplier relationships: The Company states that 'We take a systematic approach to supplier management. Our SHEIN Responsible Sourcing (SRS) evaluation system requires regular audits of our primary suppliers against leading industry standards and best practices, including the human rights objectives outline here and in our Supplier Code of Conduct. [...] The results of the SRS assessment are shared with our suppliers to encourage continuous improvement. <p>The SRS system also flags zero-tolerance violations of our Supplier Code of Conduct and this Policy. If such violations are identified, SHEIN will terminate its relationship with the supplier unless the supplier takes immediate, appropriate remedial action.' [Human Rights Policy, 09/2022: sheingroup.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describes positive HRs incentives for business relationships • Not Met: Works with suppliers to meet HRs requirements
B.1.8	Approach to engagement with affected stakeholders	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Describes how workers and communities identified and engaged in the last two years • Not Met: Discloses stakeholders whose HRs may be affected • Not Met: Provides two examples of engagement with stakeholders <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Analysis of stakeholder views on company's HRs issues • Not Met: Describes how 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	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Describes process of identifying risks in own operations • Not Met: Describes process for identifying risks in business relationships <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describes global risk identification system incl. stakeholder consultation • Not Met: Describes how risk identification system is triggered by new circumstances • Not Met: Describes risks identified in relation to new circumstances
B.2.2	Assessing human rights risks and impacts	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Describes assessment process and discloses salient HRs risks: The Company indicates that 'in 2022, SHEIN completed an impact-based materiality assessment in partnership with BSR [...]. This multi-stakeholder process included focs groups, interviews, surveys and gatherine of online risk intelligence. It involved both SHEIN's senior leadership and operationsl teams as well as external partners and representatives from civil society, academia and media covering the ESG space. The qualitative data resulting from this assessment expresses how our economic, soil and environmental impacts are perceived along our value chain and how they translate into associated risks and opportunities for our company. The results of our materiality assessment were a key component of establishing our evoluSHEIN roadmap and our reporting on material issues'. However evidence refers to a materiality assessment. This subindicator looks for a description of the process by which, the Company, having identified potential human rights risks and impacts, determines its saliency considering social, geographical, economic or other factors into account. [2022 Sustainability and Social Impact Report, 2023: sheingroup.com] • Not Met: Describes how process applies to supply chain

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not Met: Public disclosure of results of HRs risk assessment: Although the Company shows a chart with the specific topics included in the materiality matrix, this subindicator looks for the outcomes of an assessment conducted following the requirements from the previous subindicators. [2022 Sustainability and Social Impact Report, 2023: sheingroup.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: The Company has provided comments to CHRB regarding this sub-indicator. However, the evidence was not material.
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	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Grievance mechanism accessible to all workers: The Company states 'Workers have the right to escalate grievances to SHEIN without fear of retaliation. Supplier partners will ensure visible posting of the SHEIN Code of Conduct, including the section which specifies access to the dedicated SHEIN grievance WeChat hotline and email.' However, it is not clear how workers can report grievances. No information was found regarding the WeChat hotline and email. [Human Rights Policy, 09/2022: sheingroup.com] Score 2 <ul style="list-style-type: none"> • Not Met: Grievance mechanism available in appropriate languages and workers made aware • Not Met: Describes how workers in supply chain access grievance mechanism: The Company states 'Workers have the right to escalate grievances to SHEIN without fear of retaliation. Supplier partners will ensure visible posting of the SHEIN Code of Conduct, including the section which specifies access to the dedicated SHEIN grievance WeChat hotline and email.' However, it is not clear how workers can report grievances. No information was found regarding the WeChat hotline and email. The Company has provided comments to CHRB regarding this indicator. However, this document or its content has not been found in publicly available sources. [Human Rights Policy, 09/2022: sheingroup.com] & [Responsible Sourcing Policy, N/A: sheingroup.com] • Not Met: Expects suppliers to convey expectation to their suppliers
C.2	Grievance mechanism(s) for external individuals and communities	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Grievance mechanism accessible to all external individuals and communities Score 2 <ul style="list-style-type: none"> • Not Met: Grievance mechanism available in appropriate languages and affected stakeholders made aware • Not Met: Describes how external individuals/communities access grievance mechanism • Not Met: Expects supplier to convey expectation to their suppliers

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.3	Users are involved in the design and performance of the mechanism(s)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Describes how users engaged on design and performance • Not Met: Provides user engagement examples (at least two) on design and performance Score 2 <ul style="list-style-type: none"> • Not Met: Describes how users engaged on improvement of mechanism • Not Met: Provides user engagement examples (at least two) on improvement
C.4	Procedures related to the mechanism(s) are equitable, publicly available and explained	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Describes procedure and timescales for managing complaints or concerns • Not Met: Describes technical, financial, advisory support to enable equal access Score 2 <ul style="list-style-type: none"> • Not Met: Describe types of outcome to complainant through use of mechanism • Not Met: Describes escalation to senior levels / independent adjudicators
C.5	Prohibition of retaliation for raising complaints or concerns	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Public statement prohibiting retaliation against workers/stakeholders: The Company states that 'Workers have the right to escalate grievances to SHEIN without fear of retaliation.' However, it is not clear whether this applies to all stakeholders. [Human Rights Policy, 09/2022: sheingroup.com] Score 2 <ul style="list-style-type: none"> • Not Met: Describes practical measures to prevent retaliation • Not Met: Specifies no legal action, firing or violence • Not Met: Expects suppliers to prohibit retaliation against workers/stakeholders
C.6	Company involvement with state-based judicial and non-judicial grievance mechanisms	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Complainants not asked to waive legal rights • Not Met: Does not require confidentiality provisions Score 2 <ul style="list-style-type: none"> • Not Met: Cooperates with state based non judicial mechanisms • Not Met: Example of issue resolved (if applicable)
C.7	Remedying adverse impacts	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Describes approach taken to remedy adverse HRs impacts • Not Met: Describes how remedy would be provided if no adverse impact identified Score 2 <ul style="list-style-type: none"> • Not Met: Describes changes to systems, processes and practices to prevent future impacts • Not Met: Describes approach to monitoring/implementing agreed remedy • Not Met: Describes approach to learning from incidents if no adverse impacts identified
C.8	Communication on the effectiveness of grievance mechanism(s) and incorporating lessons learned	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Discloses number of grievances filed, addressed or resolved and outcomes achieved • Not Met: Example of how lessons from mechanism improved HRs management system Score 2 <ul style="list-style-type: none"> • Not Met: Describes process to evaluate mechanism and changes made as a result • Not Met: Describes procedures to address delays of outcomes agreed with stakeholders

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.2.1.b	Living wage (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Requirements on living wage in supplier codes and contracts • Not Met: Describes work with suppliers on living wage Score 2 <ul style="list-style-type: none"> • Not Met: Assessment of scope of payment below living wage in supply chain • Not Met: Analysis of trends demonstrating progress

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.2.2	Aligning purchasing decisions with human rights	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Describes practices to avoid price or short notice requirements that undermine HRs • Not Met: Describes practices to pay suppliers in line with agreed timeframes • Not Met: Reviews own operations to mitigate negative impact of purchasing practices Score 2 <ul style="list-style-type: none"> • Not Met: Meets all requirements under score 1 • Not Met: Example of assessing and changing of purchasing practices
D.2.3	Mapping and disclosing the supply chain	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Identifies direct and indirect suppliers including manufacturing sites Score 2 <ul style="list-style-type: none"> • Not Met: Discloses names and locations of significant parts of supply chain and how significance was defined • Not Met: Discloses direct or indirect suppliers involved in higher-risk activities
D.2.4.b	Prohibition of child labour: Age verification and corrective actions (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 child labour in supplier codes and contracts: The Company states that 'Supplier partners shall not hire minors under age 16. If supplier partners have any employees that are older than 16 years of age, but under 18 years of age, supplier partners shall not require them to engage in work in any form that is harmful to the body, and must provide such employees with necessary work protection.' It also states that 'We have a zero-tolerance policy for child labor, human trafficking, and migrant forced labor. SHEIN's Supplier Code of Conduct states each of these commitments clearly, and all our suppliers must sign it and affirm their commitment to our Supplier Code of Conduct if they wish to work with us.' [Supplier Code of Conduct, N/A: us.shein.com] & [Human Rights Policy, 09/2022: sheingroup.com] Score 2 <ul style="list-style-type: none"> • Not Met: Describes work with suppliers on eliminating child labour • Not Met: Assessment of scope of child labour in supply chain: SHEIN's Sustainability Report discloses that in 2021, 1.8% of audited suppliers had individuals under the age of 16 present in their workforce. This percentage decreased to 0.3% in 2022. However, no evidence was found about the number of suppliers' workers affected by child labour. [2022 Sustainability and Social Impact Report, 2023: sheingroup.com] • Not Met: Analysis of trends demonstrating progress
D.2.5.b	Prohibition of forced labour: Recruitment fees and costs (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 debt/fees in supplier codes and contracts: SHEIN's Suppliers Code of Conduct states: 'The supplier partner shall not use forced labor, including prison labor, bonded labor or other forms of forced labor, and comply with the International Labor Organization's Conventions on forced labor (including amendments, supplements or restatements from time to time), in their direct or indirect procurement. [...] and workers must not be required to pay recruitment, hiring, agents' or brokers' fees, or other related fees for their employment either in their home country or the country where work is performed. Supplier partner is required to bear or reimburse to their workers the cost of any such fees incurred at any point during the recruitment process, even if outside of the suppliers' direct control of the recruitment process. Upon the Customer's request, all fees and expenses charged to workers must be disclosed to Customer and/or communicated to workers in their native language in advance of employment or work.' [Supplier Code of Conduct, N/A: sheingroup.com] Score 2 <ul style="list-style-type: none"> • Not Met: Describes work with suppliers on debt/fees for job seekers/workers • Not Met: Assessment scope of payment of recruitment fees in supply chain • Not Met: Analysis of trends demonstrating progress

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.2.5.d	Prohibition of forced labour: Wage practices (in the supply chain)	0	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: SHEIN's Supplier Code of Conduct states: 'The supplier partner shall pay employees' wages on time, and the amount of wages shall not be lower than the minimum wage required by the laws of the country/region where the supplier partner is located, and comply with the legal requirements for overtime compensation. There shall not be disciplinary deduction from wage payment'. No evidence found of a specific requirement to pay in full, or further details in relation to deductions. Not Met: Describes work with suppliers on paying workers regularly, in full and on time Score 2 <ul style="list-style-type: none"> Not Met: Assessment scope of failure to pay workers in full and on time in supply chain Not Met: Analysis of trends demonstrating progress
D.2.5.f	Prohibition of forced labour: Restrictions on workers (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"> Not Met: Requirements on free movement in supplier codes and contracts Met: Describes working with suppliers on free movement of workers: The Company states that 'SHEIN is committed to doing business with suppliers that strive to meet the highest labor standards, including preventing all forms of forced labor from entering the supply chain. SHEIN maintains a zero-tolerance policy against any form of forced labor at all points in its overall supply chain. SHEIN employees and third-party contractors, vendors, or suppliers are informed and trained on SHEIN's efforts to prevent and eliminate any potential risks of forced labor within its supply chain. In accordance with SHEIN's Supplier Code of Conduct, SHEIN requires suppliers to undertake similar efforts to do the same.' [Code of Ethics, 01/2023: sheingroup.com] Score 2 <ul style="list-style-type: none"> Not Met: Assessment of scope of restriction of movement in supply chain Not Met: Analysis of trends demonstrating progress
D.2.6.b	Freedom of association and collective bargaining (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not Met: Requirements on FoA/CB in suppliers codes and contracts: The Company states that 'Supplier partners should respect employees' freedom of association and the right to collective bargaining between employees and management. Employees have the right to form and join trade unions and other workers' organizations of their own choosing, and they shall not be subject to any harassment, interference or retaliation for the foregoing actions.' However, there is no evidence of these commitments are contractual. [Supplier Code of Conduct, N/A: sheingroup.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.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.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.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 that 'Supplier partners shall arrange working hours reasonably and shall comply with local laws and regulations.' However, there is no evidence of any contractual commitment. [Supplier Code of Conduct, N/A: us.shein.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		<ul style="list-style-type: none"> • Area: Working Hours • Headline: Shein factory employees work 18 hours a day with no weekend, report finds • Story: Workers at factories in China that supply clothes to Shein frequently work up to 18 hours a day with no weekends and just one day off per month, according to an undercover investigation from Channel 4 and the i newspaper in the UK. <p>The news organizations say a woman using a fake name got a job inside two factories and secretly filmed what she saw as she worked there.</p> <p>"There's no such thing as Sundays here," said one worker shown in the footage, who said they work seven days a week.</p> <p>At one of the factories, workers get a base salary of 4,000 yuan per month — the equivalent of roughly \$556 — to make at least 500 pieces of clothing per day, but their first month's pay is withheld from them, per the investigation. Many of these workers toil long hours to earn a commission of 0.14 yuan, or just two cents, per item.</p> <p>[Insider, 16/10/2022, "Shein factory employees are working 18-hour days for pennies per garment and washing their hair on lunch breaks because they have so little time off, new report finds": businessinsider.com] [Business and Human Rights Resource Centre, 16/10/2022, "China: Shein factory employees work 18 hours a day with no weekends earning just two cents per item, report finds": business-humanrights.org]</p>
E(1).1	The company has responded publicly to the allegation	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Public response: The Company replied to Insider that it was 'extremely concerned' and had 'requested specific information from Channel4 so that we can investigate'. [Insider, 16/10/2022: businessinsider.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Detailed response: The response from the Company is vague and does not address the specific rights violations raised in the allegation. [Insider, 16/10/2022: businessinsider.com]
E(1).2	The company has investigated and taken appropriate action	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Engaged with stakeholders: The Company released key details from an independent investigation it had launched after being informed of the allegations. However, no information was found as to whether this included engagement with affected stakeholders. The Company further provided feedback for this indicator. However, it was not material for the assessment. [SHEIN commits \$15m to improving standards at suppliers' factories, 05/12/2022: sheingroup.com] • Not Met: Identified cause: While the Company reveals some findings it does not present what it found to be underlying causes of the events. [SHEIN commits \$15m to improving standards at suppliers' factories, 05/12/2022: sheingroup.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Identified and implemented improvements: The Company has announced that it will be investing \$15m in physical enhancements to supplier factories in order to help ensure workers rights are respected. [SHEIN commits \$15m to improving standards at suppliers' factories, 05/12/2022: sheingroup.com] • Not Met: Stakeholder input to steps taken

Indicator Code	Indicator name	Score (out of 2)	Explanation
E(1).3	The company has engaged with affected stakeholders to provide for or cooperate in remedy(ies)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Provided remedy • Not Met: Evidence for lack of Impact or link Score 2 <ul style="list-style-type: none"> • Not Met: Remedy satisfactory to stakeholders • Not Met: Remedy delivered • Not Met: Independent remedy process used
E(2).0	Serious allegation No 2		<ul style="list-style-type: none"> • Area: Working Hours • Headline: NGO report finds Shein suppliers in alleged violation of Chinese labour laws • Story: A report by NGO Public Eye has found that workers of suppliers of Shein and its parent company Zoetop Business were allegedly performing excessive overtime in violation of Chinese labour laws. According to the report, employees who are mostly migrants were allegedly performing 75-hour workweeks with three shifts daily and one day off per month at six factories in Guangzhou near Shein's headquarter. Some workers have also claimed of being paid per item sold only and not being provided with contracts. In one facility, the report found closed windows and lack of emergency exits that posed fatal risks in case of a fire. [BBC, 12/11/2021, "Shein suppliers' workers doing 75-hour week, finds probe": bbc.com] [Public Eye, 11/2021, "Toiling away for Shein Looking behind the shiny façade of the Chinese "ultra-fast fashion" giant": stories.publiceye.ch]
E(2).1	The Company has responded publicly to the allegation	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Public response: The Company stated in response to the allegation: 'Shein said: "Upon learning of the report, we immediately requested a copy and when we receive and review the report, we will initiate an investigation. We have a strict supplier Code of Conduct which includes stringent health and safety policies and is in compliance with local laws. If non-compliance is identified we will take immediate action," the spokesperson said.' [BBC, 12/11/2021: bbc.com] Score 2 <ul style="list-style-type: none"> • Not Met: Detailed response: The Company's response does not go into detail regarding the alleged rights violations.
E(2).2	The company has investigated and taken appropriate action	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Engaged with stakeholders • Not Met: Identified cause Score 2 <ul style="list-style-type: none"> • Not Met: Identified and implemented improvements • Not Met: Stakeholder input to steps taken
E(2).3	The company has engaged with affected stakeholders to provide for or cooperate in remedy(ies)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Provided remedy • Not Met: Evidence for lack of Impact or link Score 2 <ul style="list-style-type: none"> • Not Met: Remedy satisfactory to stakeholders • Not Met: Remedy delivered • Not Met: Independent remedy process used

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