

**Corporate Human Rights Benchmark
2023 Company Scorecard**

Company name Shenzhou International
Sector Apparel (supply chain and own operations)
Overall score 2.5 out of 100

Theme score	Out of	For theme
0.2	10	A. Governance and Policy Commitments
1.1	25	B. Embedding Respect and Human Rights Due Diligence
0.0	20	C. Remedies and Grievance Mechanisms
0.7	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"> • Not Met: General HRs commitment • Not Met: Universal Declaration of Human rights (UDHR) • Not Met: International Bill of Human Rights Score 2 <ul style="list-style-type: none"> • Not Met: Commitment to UNGPs • 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	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 Score 2 <ul style="list-style-type: none"> • Not Met: Expects suppliers to commit to ILO core principles • Not Met: Explicitly lists all four ILO core principles for suppliers: The Code of Conduct has explicit requirements regarding the following ILO core areas: discrimination, forced labour, child labour. The Code 'states our expectations of our suppliers and sets out the minimum standards we expect each of our suppliers to meet'. However, it is not clear the Company expects suppliers to commit to respect the right to freedom of association and collective bargaining. [Code of Conduct, N/A: shenzhouintl.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
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 Code of Conduct indicates: ‘Health and safety shall remain a priority in business operations. We ensure that the health and safety of our employees is effectively managed, that the main body of the building is safe, that fire prevention measures are taken, that machinery and equipment are safe, that safe drinking water and proper sanitation are provided, and that chemicals are effectively managed’. Although the Code seems to be a supplier Code, the Company appears to be making reference to its own operations. [Code of Conduct, N/A: shenzhouintl.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 Code of Conduct indicates: ‘Health and safety shall remain a priority in business operations. We ensure that the health and safety of our employees is effectively managed, that the main body of the building is safe, that fire prevention measures are taken, that machinery and equipment are safe, that safe drinking water and proper sanitation are provided, and that chemicals are effectively managed’. Suppliers are expected to comply with the Code. [Code of Conduct, N/A: shenzhouintl.com] • Not Met: Expects suppliers to commit to ILO working hours standards or 48 hour regular work week
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 2021 ESG Report indicates: ‘Female employees assume a wide variety of posts on different levels in the Group. In strict compliance with relevant local laws and regulations, such as the “Law of the People’s Republic of China on the Protection of Women’s Rights and Interests”, “Labor Protection of Female Employees” and “Healthcare Work of Female Employees”, the Group protects the rights of female employees from the sources. The Group is concerned about the problems encountered by female employees in their work and life and constantly improves the working environment and condition for female employees’. However, no commitment to respect the women’s rights found in a formal policy document. [2021_ESG Report, 2022: shenzhouintl.com] • Not Met: Commitment to children's rights • 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 • Not Met: Expects suppliers to make this commitment <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Commitment to collaborate with judicial or non-judicial mechanisms • Not Met: Commitment to work with suppliers on remedy
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	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not Met: Board level responsibility for HRs: The Company states that 'The Group has established the Sustainable Development Committee (Sustainability Council) chaired by the Chairman of the Board. And the principal members of the Council has been appointed, including Administration, Tier 1 and Tier 2 production, to coordinate the daily operation of the Council and report to the relevant leaders of the Board and management on a regular basis.' However, it does not specify whether this includes a responsibility for human rights. [2022 ESG Report: shenzhouintl.com] Score 2 <ul style="list-style-type: none"> Not Met: Describes HRs expertise of Board member
A.2.2	Board responsibility	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not Met: Process to review HRs strategy at board level: The Company states that 'The Sustainability Council is responsible for summarizing the Group's initiatives, deployment and performance every year, sorting out and learning the targets and directions from the customers and industry, formulating the key strategic directions for the next year and decades, listening to the quarterly work report, supervising and evaluating the performance of each work and timely adjustment, as well as taking emergency management measures for unexpected events. The Board of Directors of the Group meets at least four times a year to formulate strategic guidelines and objectives, to approve the major annual and medium/long-term investment or matter decisions.' However, it is not clear if human rights issues are discussed. [2022 ESG Report: shenzhouintl.com] Score 2 <ul style="list-style-type: none"> Not Met: Example of HRs issues/trends discussed in last reporting period
A.2.3	Incentives and performance management	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not Met: At least one board member incentive linked to HRs commitments Not Met: Incentive scheme linked to key HRs risks beyond employee H&S Score 2 <ul style="list-style-type: none"> Not Met: Performance criteria linked to HRs made public Not Met: Review of other board incentives for coherence with HRs policies
A.2.4	Business model strategy and risks	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not Met: Board process to review business model and strategy for HRs risks Not Met: Describes frequency and triggers for reviewing business model Score 2 <ul style="list-style-type: none"> Not Met: Meets both requirements under score 1 Not Met: Example of actions resulting from reviews

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

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.1	Responsibility and resources for day-to-day human rights functions	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not Met: Score of 1 on A.1.2.a Not Met: Senior responsibility for HRs implementation and decision making Score 2 <ul style="list-style-type: none"> Not Met: Describes day-to-day responsibility for implementing HRs commitments Not Met: Day-to-day resources and expertise allocation in own operations Not Met: Resources and expertise allocation in supply chain
B.1.2	Incentives and performance management	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not Met: Senior manager incentives linked to HRs commitments Not Met: Incentive scheme linked to key HRs risks beyond employee H&S Score 2 <ul style="list-style-type: none"> Not Met: Performance criteria linked to HRs made public Not Met: Review of other senior management incentives for coherence with HRs policies

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.3	Integration with enterprise risk management	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: HRs risks integrated as part of enterprise risk system: The company indicates that the 'In charge of assessing and determining the ESG risk exposure, the management of the Group also ensures the Group establishes appropriate and effective ESG risk management and internal control systems and reports to the Board the risks and opportunities related to ESG, and provides confirmation on the effectiveness of the ESG system'. However, it is not clear if this risk analysis is integrated into the general enterprise risk system. [2021_ESG Report, 2022: shenzhouintl.com] • 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 <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"> • Not Met: Meets ILO requirement for suppliers on A.1.2.a • Not Met: Describes steps to communicate HRs policies to supply chain • Not Met: Requires suppliers to communicate HRs policies <p>Score 2</p> <ul style="list-style-type: none"> • Met: Describes how HRs policies are contractual/binding for suppliers: The company states that 'suppliers have to be complied with the "Code of Conduct of Shenzhou", which include the following contents: prohibition of use of forced labor and child labor, prohibition of discrimination, harassment and bullying, anti-corruption, timely payment of salaries as well as compliance with occupational health, environment protection and safety standards'. In this context, the company states that 'at the same time these are the standards we refer to for evaluating the performances of and selecting suppliers'. Suppliers are required to sign the Code of Conduct. [2021_ESG Report, 2022: shenzhouintl.com] & [Code of Conduct, N/A: shenzhouintl.com] • Not Met: Requires suppliers to cascade contractual/binding HRs policies to its suppliers
B.1.5	Training on Human Rights	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Score of at least 1 on A.1.2.a • Not Met: Describes how workers are trained on HRs policy commitments: The Company states that 'The Group also plans to organise anti-corruption courses for the integrity training of new employees, current employees and senior management annually.' However no clear information was found on whether this training is being conducted or if this is an aspirational statement. [2021_ESG Report, 2022: shenzhouintl.com] • Not Met: Trains relevant managers including procurement on HRs <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 • Not Met: Discloses % of supply chain monitored • 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 • Not Met: Discloses findings and number of correction action processes

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.7	Engaging and terminating business relationships	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: HRs performance affects selection suppliers: The Company states about its code of conduct that 'it sets out [...] the criteria by which we evaluate supplier performance and choose our suppliers'. The Company further states that 'we hope to reach consensus with our suppliers that satisfying these minimum standards is essential for corporate long-term development and continuous improvement'. [2021_ESG Report, 2022: shenzhouintl.com] & [Code of Conduct, N/A: shenzhouintl.com] • Met: HRs performance affects continuation supplier relationships: See above. [2021_ESG Report, 2022: shenzhouintl.com] <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: The Company states that 'In charge of assessing and determining the ESG risk exposure, the management of the Group also ensures the Group establishes appropriate and effective ESG risk management and internal control systems and reports to the Board the risks and opportunities related to ESG, and provides confirmation on the effectiveness of the ESG system.' However, no description of the process to identify human rights risks was found. [2021_ESG Report, 2022: shenzhouintl.com] • 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 • Not Met: Describes how process applies to supply chain • Not Met: Public disclosure of results of HRs risk assessment <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets all requirements under score 1 • Not Met: Describes how assessment involved affected stakeholders
B.2.3	Integrating and acting on human rights risks and impact assessments	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Describes system to prevent, mitigate and remediate HRs issues • Not Met: Describes how global system applies to supply chain • Not Met: Example of actions decided on at least 1 salient HRs issue <p>Score 2</p> <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	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Describes system for evaluation effectiveness of actions • Not Met: Example of lessons learned from evaluation effectiveness of actions <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets all requirements under score 1 • Not Met: Involves stakeholders in evaluation effectiveness of actions

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.5	Communicating on human rights impacts	0	The individual elements of the assessment are met or not as follows: Score 1 • Not Met: Provides two examples of comms with stakeholders Score 2 • 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 • Not Met: Grievance mechanism accessible to all workers: The Whistleblowing Policy indicates that 'the Group expects and encourages its internal staff and those who deal with the Group (including customers, suppliers, distributors, service providers, agents, consultants, contractors, creditors, debtors, etc.) to make timely reports of misconduct [...]'. Besides that, the Company states that 'On 28th May, 2019, a multi-channel employee service platform "Shenzhou e-Home" independently developed by the Group was officially launched. Integrating anonymous complaint consultation, information release, online learning, questionnaire survey and other functions, Shenzhou e-Home aims to provide all Shenzhou employees with the most convenient and transparent communication channel, to solve their troubles, listen to their voice, and facilitate the sustainable development of the Group.' However, it is not clear if violations of human rights can be reported via this channel. [Whistleblowing Policy, N/A: shenzhouintl.com] & [2022 ESG Report: shenzhouintl.com] Score 2 • Not Met: Grievance mechanism available in appropriate languages and workers made aware • Not Met: Describes how workers in supply chain access grievance mechanism • Not Met: Expects suppliers to convey expectation to their suppliers
C.2	Grievance mechanism(s) for external individuals and communities	0	The individual elements of the assessment are met or not as follows: Score 1 • Not Met: Grievance mechanism accessible to all external individuals and communities: In the Whistleblowing Policy, the company states: 'to fulfill this commitment, the Group expects and encourages its internal staff and those who deal with the Group (including customers, suppliers, distributors, service providers, agents, consultants, contractors, creditors, debtors, etc.) to make timely reports of misconduct, malpractice and irregularities so that the Group can detect and rectify wrongful or improper conduct as early as possible, before suffering from damage'. However, there is no mention about how the mechanism can be accessible to all external individuals and communities. [Whistleblowing Policy, N/A: shenzhouintl.com] Score 2 • 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
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 • 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 • 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 • Not Met: Describes procedure and timescales for managing complaints or concerns • Not Met: Describes technical, financial, advisory support to enable equal access Score 2 • 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	0	The individual elements of the assessment are met or not as follows: Score 1 • Not Met: Public statement prohibiting retaliation against workers/stakeholders: The company states that the 'Whistleblowing Policy (the "Policy") form an

Indicator Code	Indicator name	Score (out of 2)	Explanation
	complaints or concerns		important part of effective risk management and internal control [...] to ensure that whistleblowers are properly protected, and to ensure that whistleblowers are not penalized or retaliated against for reporting in good faith'. However, it is not clear if this applies to external stakeholders as well as workers. [Whistleblowing Policy, N/A: shenzhouintl.com] <ul style="list-style-type: none"> • Not Met: Describes practical measures to prevent retaliation Score 2 <ul style="list-style-type: none"> • Not Met: Specifies no legal action, firing or violence • Not Met: Expects suppliers to prohibit retaliation against workers/stakeholders
C.6	Company involvement with state-based judicial and non-judicial grievance mechanisms	0	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.a	Living wage (in own production or manufacturing operations)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Pays living wage or sets time-bound target: The 2021 ESG Report indicates that 'the Group paid competitive salary to the employees, employees received an average salary raise of approximately 10% to 13% each year for the past ten years. The Group sets up Shenzhou medical room at Ningbo factory area to conduct annual and regular body checks for staff, two free body checks are provided to the staff in Vietnam factory area each year'. However, the company does not mention any other benefit that could indicate that it pays a 'living wage'. [2021_ESG Report, 2022: shenzhouintl.com] Score 2 <ul style="list-style-type: none"> • Not Met: Describes how living wage determined • Not Met: Achieved paying a living wage • Not Met: Reviews definition living wage with unions
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
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 Score 2 <ul style="list-style-type: none"> • Not Met: Describes practices to pay suppliers in line with agreed timeframes

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • 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.a	Prohibition of child labour: Age verification and corrective actions (in own production or manufacturing operations)	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Indicates it does not use child labour: The 2021 ESG Report indicates that 'In 2003, in order to completely eradicate child labor, underage workers and forced labor, the Group formulated some requirements like the "Strict Prohibition of Engaging Child Labor Administrative Provisions", "Underage Worker Administrative Provisions" [...], such requirements were published as guidelines and distributed to human resources department at different locations for uniform implementation. Such policies have been consistently applied to our factories in Vietnam and Cambodia'. However, it is not clear if the policies are applied in all locations where the Company has operations. [2021_ESG Report, 2022: shenzhouintl.com] Score 2 <ul style="list-style-type: none"> • Met: Age verification of recruited workers: The Company states that 'new employee must provide his/her identity document when commencing employment, so as to verify his/her actual age'. Also, it indicates 'in the recruitment interview, interviewers will compare very carefully the photograph in the identity document and the genuine face. If there is much difference, or the job applicant looks significantly younger, then the actual age shall be verified by identification system or otherwise'. [2021_ESG Report, 2022: shenzhouintl.com] • Not Met: Remediation if child labour found in operations
D.2.4.b	Prohibition of child labour: Age verification and corrective actions (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Requirements on child labour in supplier codes and contracts: The company's Code of Conduct indicates that 'Shenzhou Group's suppliers shall not employ persons under the age of 16; they shall not arrange workers under the age of 18 to work in dangerous environments or to perform night work'. However, there is no mention about remediation programmes. [Code of Conduct, N/A: shenzhouintl.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 • Not Met: Analysis of trends demonstrating progress
D.2.5.a	Prohibition of forced labour: Recruitment fees and costs (in own production or manufacturing operations)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Job seekers/workers do not pay recruitment fee • Not Met: Commitment to fully reimburse recruitment fees paid Score 2 <ul style="list-style-type: none"> • Not Met: Describes implementation and monitoring in own operations, incl. service providers
D.2.5.b	Prohibition of forced labour: Recruitment fees and costs (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Requirements on debt/fees in supplier codes and contracts • Not Met: Describes work with suppliers on debt/fees for job seekers/workers Score 2 <ul style="list-style-type: none"> • Not Met: Assessment scope of payment of recruitment fees in supply chain • Not Met: Analysis of trends demonstrating progress

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.2.5.c	Prohibition of forced labour: Wage practices (in own production or manufacturing operations)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Pays workers regularly, in full and on time • Not Met: Payslip workers shows wages and legitimate deductions Score 2 <ul style="list-style-type: none"> • Not Met: Describes implementation and monitoring in own operations, incl. service providers
D.2.5.d	Prohibition of forced labour: Wage practices (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Requirements on paying in full and on time in supplier codes and contracts • 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.e	Prohibition of forced labour: Restrictions on workers (in own production or manufacturing operations)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Does not retain documents or restrict movement of workers Score 2 <ul style="list-style-type: none"> • Not Met: Describes implementation and monitoring in own operations, incl. service providers
D.2.5.f	Prohibition of forced labour: Restrictions on workers (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Requirements on free movement in supplier codes and contracts • Not Met: Describes working with suppliers on free movement of workers Score 2 <ul style="list-style-type: none"> • Not Met: Assessment of scope of restriction of movement in supply chain • Not Met: Analysis of trends demonstrating progress
D.2.6.a	Freedom of association and collective bargaining (in own production or manufacturing operations)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Commits to measures prohibiting interference with trade unions: The company indicates that prohibits discriminations against union membership. However, the company does not mention measures to prohibit any form of intimidation, harassment, retaliation or violence against workers seeking to exercise the right to form and join a trade union of their choice. [Code of Conduct, N/A: shenzhouintl.com] Score 2 <ul style="list-style-type: none"> • Not Met: Discloses % total workforce covered by CB agreements • Not Met: Meets both requirements under score 1
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 • Not Met: Describes work with suppliers on FoA/CB Score 2 <ul style="list-style-type: none"> • Not Met: Assessment of scope of restriction of FoA/CB in supply chain • Not Met: Analysis of trends demonstrating progress
D.2.7.a	Health and safety: Fatalities, lost days, injury, occupational disease rates (in own production of manufacturing operations)	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Describes process to identify H&S risks and impacts: The 2021 ESG report indicates that 'the Group cares about the physical health of employees. It sets up employee health records for every employee and also organizes routine examination of occupational diseases'. Also, it indicates that 'with safety, health and environmental protection in mind, the Group has established a safety department, an emergency response team and a professional Three Wastes Treatment System to reduce the use of toxic and hazardous substances for meeting the standards of Three Wastes treatment. These ensure the occupational health of employees, [...] and facilitate the response to and handling of emergencies'. [2021_ESG Report, 2022: shenzhouintl.com] • Met: Discloses injury rate or lost days for own workers in last reporting period: The company states that 'a total of 103 injuries of the Group were recorded in 2021'. [2021_ESG Report, 2022: shenzhouintl.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Met: Discloses fatalities for own workers in last reporting period: In the 2021 ESG Report, the company stated that there were no 'significant injuries and deaths for 3 consecutive years'. [2021_ESG Report, 2022: shenzhouintl.com] • Not Met: Discloses occupational disease rate for own workers in last reporting period Score 2 <ul style="list-style-type: none"> • Not Met: Sets targets for H&S performance • Not Met: Met targets or explains why not or how improve H&S management systems
D.2.7.b	Health and safety: Fatalities, lost days, injury, occupational disease rates (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Requirements on H&S in supplier codes and contracts • Not Met: Discloses injury rate or lost days in supply chain in last reporting period: The Company states that 'In 2022, the Group recorded 126 work-related injuries and illness, representing 0.134% of the total number of employees. [...] The average lost time of each injury was about 15 days.' However, no information was found on the supply chain. [2022 ESG Report: shenzhouintl.com] • Not Met: Discloses fatalities for workers in supply chain in last reporting period: The Company states that the 2022 Performance was of 'Zero major work-related injuries and deaths at all factories'. However, no information was found on the supply chain. [2022 ESG Report: shenzhouintl.com] • Not Met: Discloses occupational disease rate in supply chain in last reporting period Score 2 <ul style="list-style-type: none"> • Not Met: Describes work with suppliers of H&S • Not Met: Assessment of scope of H&S issues in supply chain • Not Met: Analysis of trends demonstrating progress
D.2.8.a	Women's rights (in own production or manufacturing operations)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Describes processes to stop harassment and violence against women: The company states that 'female employees assume a wide variety of posts on different levels in the Group. In strict compliance with relevant local laws and regulations, such as the "Law of the People's Republic of China on the Protection of Women's Rights and Interests", "Labor Protection of Female Employees" and "Healthcare Work of Female Employees", the Group protects the rights of female employees from the sources'. However, the company does not describes its process to prohibit and address harassment, intimidation and violence against women. [2021_ESG Report, 2022: shenzhouintl.com] • Not Met: Working conditions take into account gender issues: The company indicates that 'baby breastfeeding facilities are provided to the female employees in each factory area'. Furthermore, the company states that 'the Group cared about the health of female employees, worked hard towards disease prevention and improved the physical fitness of female employees. [...] The physicians from district level TCM hospitals provided free consultation and free physical examinations for everyone, answered in detail the questions raised by our employees regarding prevention and treatment [...]'. however, it is not clear if the Company takes women's health into consideration when assigning work tasks. [2021_ESG Report, 2022: shenzhouintl.com] • Not Met: Measures and steps to address gender pay gap at all levels of employment Score 2 <ul style="list-style-type: none"> • Not Met: Meets all requirements under score 1 • Not Met: Analysis of trends demonstrating progress closing gender pay gap
D.2.8.b	Women's rights (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Requirements on women's rights in contracts/codes with suppliers • Not Met: Describes work with suppliers on women's rights Score 2 <ul style="list-style-type: none"> • Not Met: Assessment of scope of unsafe working conditions/discrimination against women in supply chain • Not Met: Analysis of trends demonstrating progress

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.2.9.a	Working hours (in own production or manufacturing operations)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Respects HRs regarding working hours/breaks/rest: The company states that 'the Group complies with national labor laws and regulations and arranges the day off and working timetables stringently in accordance with national requirements'. Furthermore, the company states that 'the working hour of the employees of the Group generally starts at 8 a.m. and finishes at 5 p.m. and the normal working hour is generally less than 8 hours. If overtime work is needed, the daily overtime will be less than 3 hours and the monthly overtime will be less than 36 hours'. However, it is not clear if the Company complies with international standards of 48hr regular work week. [2021_ESG Report, 2022: shenzhouintl.com] • Not Met: Assesses ability of workers to comply with working hours commitments when allocating work <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describes implementation and monitoring in own operations
D.2.9.b	Working hours (in the supply chain)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Requirements on working hours in codes/contracts with suppliers • Not Met: Describes work with suppliers on working hours <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of scope of excessive working hours in supply chain • Not Met: Analysis of trends demonstrating progress

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
E(1).0	Serious allegation No 1		No allegations meeting the CHRB severity threshold were found, and so the score of 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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