

## Corporate Human Rights Benchmark 2018 Company Scoresheet



**Company Name** Ross Stores  
**Industry** Apparel (Supply Chain and Own Operations)  
**Overall Score (\*)** 5.8 out of 100

Theme Score	Out of	For Theme
0.5	10	A. Governance and Policies
1.4	25	B. Embedding Respect and Human Rights Due Diligence
2.1	15	C. Remedies and Grievance Mechanisms
0.0	20	D. Performance: Company Human Rights Practices
1.2	20	E. Performance: Responses to Serious Allegations
0.7	10	F. Transparency

(\*) 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 2018 Methodology document. 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 Policies (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 • Not met: General HRs commitment • Not met: UNGC principles 1 & 2 • Not met: UDHR • Not met: International Bill of Rights Score 2 • Not met: UNGPs • Not met: OECD
A.1.2	Commitment to respect the human rights of workers	0.5	The individual elements of the assessment are met or not as follows: Score 1 • Not met: ILO Core: The Company's code of business conduct and ethics contains a commitment regarding non-discrimination. No further commitments disclosed covering explicitly any other ILO core areas for its own operations. [Code of Business Conduct] • Not met: UNGC principles 3-6 • Met: All four ILO for AP suppliers: Concerning suppliers, the Ross vendor compliance manual contains the vendor code of conduct, which include all ILO core. [Ross Vendor Compliance Manual, May 2018] Score 2 • Not met: All four ILO Core: See above [Code of Business Conduct] • Not met: Respect H&S of workers: The 'Empowering our associates' section of the website contains a commitment on safe work environment. It indicates that 'we

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>are committed to providing a safe and secure environment where our customers and associates can shop and work. We operate in a manner that promotes safe stores and work practices and follows all federal and state regulations'. The Company explains some of its priorities regarding this topic. However, this commitment is not in a formal policy document [Ross Vendor Compliance Manual, May 2018]</p> <ul style="list-style-type: none"> <li>• Met: H&amp;S applies to AP suppliers: In addition, its Vendor Compliance Manual includes requirements about health and safety: 'Vendors must comply with all applicable, legally mandated standards for workplace health and safety, including but not limited to standards for workplace safety (e.g., applicable workplace or building fire and similar safety codes)'. [Ross Vendor Compliance Manual, May 2018]</li> <li>• Not met: working hours for employees</li> <li>• Met: Working hours for AP suppliers: Finally, the Vendor Compliance Manual also includes a section about Working Hours: 'Vendors must operate based on prevailing local work hours and observe applicable laws regarding vacation time, leave period, and holidays. Any time worked beyond the norm must be compensated according to local labor laws'. [Ross Vendor Compliance Manual, May 2018]</li> </ul>
A.1.3.AP	Commitment to respect human rights particularly relevant to the industry (AP)	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Women's Rights</li> <li>• Not met: Children's Rights</li> <li>• Not met: Migrant worker's rights</li> <li>• Met: Expecting suppliers to respect these rights: Its Vendor Compliance Manual includes a section about Women's Rights: 'Vendors must ensure that women are treated equally in all facets of employment. ' [Ross Vendor Compliance Manual, May 2018]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: CEDAW/Women's Empowerment Principles</li> <li>• Not met: Child Rights Convention/Business principles</li> <li>• Not met: Convention on migrant workers</li> <li>• Not met: Respecting the right to water</li> <li>• Not met: Expecting suppliers to respect these rights</li> </ul>
A.1.4	Commitment to engage with 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"> <li>• Not met: Commits to stakeholder engagement</li> <li>• Not met: Regular stakeholder engagement: In its website section 'Supporting our Communities' the Company discloses information about different social programs supported by the Company, mainly as charity. However it does not cover all potentially and actually affected stakeholders. [Supporting our Communities: <a href="https://corp.rossstores.com/responsibility#corp.rossstores.com">https://corp.rossstores.com/responsibility#corp.rossstores.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Commits to engage stakeholders in design</li> <li>• Not met: Regular stakeholder design engagement</li> </ul>
A.1.5	Commitment to remedy	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Commits to remedy</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Not obstructing access to other remedies</li> <li>• Not met: Collaborating with other remedy initiatives</li> <li>• Not met: Work with AP suppliers to remedy impacts</li> </ul>
A.1.6	Commitment to respect the rights of human rights defenders	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Zero tolerance attacks on HRs Defenders (HRDs)</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Expects AP suppliers to reflect company HRD commitments</li> </ul>

## A.2 Policy Commitments (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"> <li>• Not met: CEO or Board approves policy</li> <li>• Not met: Board level responsibility for HRs</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Speeches/letters by Board members or CEO</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.2.2	Board discussions	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Board/Committee review of salient HRs</li> <li>• Not met: Examples or trends re HR discussion</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Both examples and process</li> </ul>
A.2.3	Incentives and performance management	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Incentives for at least one board member</li> <li>• Not met: At least one key AP HR risk, beyond employee H&amp;S</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Performance criteria made public</li> </ul>

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

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.1	Responsibility and resources for day-to-day human rights functions	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Senior responsibility fo HR (inc ILO)</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Day-to-day responsibility</li> <li>• Not met: Day-to-day responsibility in supply chain</li> </ul>
B.1.2	Incentives and performance management	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Senior manager incentives for human rights</li> <li>• Not met: At least one key AP HR risk, beyond employee H&amp;S</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Performance criteria made public</li> </ul>
B.1.3	Integration with enterprise risk management	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: HR part of enterprise risk system</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Audit Ctte or independent risk assessment</li> </ul>
B.1.4.a	Communication /dissemination of policy commitment(s) within Company's own operations	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Communicates its policy to all workers in own operations: Its Code of Business Conduct does not cover all ILO core. [Code of Business Conduct]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Communication of policy commitments to stakeholder</li> <li>• Not met: How policy commitments are made accessible to audience</li> </ul>
B.1.4.b	Communication /dissemination of policy commitment(s) to business relationships	1.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Met: Steps to communicate policy commitments to BRs: The Company indicates in the Product Sourcing and Human Rights document that: 'Though Ross does not have direct control over the manufacturing processes for these products, we require suppliers to uphold our ethical standards, both contractually and through enforcement. While Ross orders and imports some products directly through its international buying agents and from manufacturers, they represent the minority of merchandise sold in our stores. For these items, we have additional requirements in place to further compliance. Ross' Standards and requirements related to sourcing and human rights are incorporated in various Company documents, including Ross' Code of Business Conduct and Ethics, Vendor Compliance Manual, Purchase Orders, Vendor Indemnification Agreements, and Buying Agent Agreements'. It also indicates in this document that 'Ross communicates its standards and requirements to vendors, Buyers and overseas buying agents during our purchasing processes'. [Product Sourcing and Human Rights]</li> <li>• Met: Including to AP suppliers: In its Vendor Compliance Manual the Company indicates: ' Ross has established the general principles below, which represent Ross's minimum expectations and serve only as a starting point for you to evaluate your practices and working conditions, and those of your subcontractors.' [Ross Vendor Compliance Manual, May 2018]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Met: How HR commitments made binding/contractual: See above [Product Sourcing and Human Rights]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Not met: Including on AP suppliers</li> </ul>
B.1.5	Training on Human Rights	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Trains all workers on HR policy commitments</li> <li>• Met: Trains relevant managers including procurement: According to the Product Sourcing and Human Rights document, 'Ross provides initial training for new buying associates, as well as ongoing training and updates to buyers and other associates involved in our product sourcing'. The vendor code of conduct contained in the vendor compliance manual contains requirements on all ILO core areas. [Product Sourcing and Human Rights] <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> </ul> </li></ul>
B.1.6	Monitoring and corrective actions	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Monitoring implementation of HR policy commitments</li> <li>• Met: Monitoring AP suppliers: The Company states in the Product Sourcing and Human Rights document that 'Ross' Legal and Transportation departments monitor and assess our supply chain for compliance related to product safety, labor laws, and human trafficking laws'. In this document it also states that, among other things, 'for products sold in our stores for which Ross is the direct importer, the Company requires the following': 'Ross requires buying agents to conduct initial in-person walk-throughs and subsequent full inspections of vendor factories. Ross regularly reviews and audits buying agent inspection reports to verify that they are complete, comprehensive, and up-to-date'; 'Ross conducts audits of buying agent inspection report to verify that they are complete, comprehensive and up-to-date'; 'Ross engages third-party auditors to conduct social compliance audits on certain vendor factories'; Ross requires its international buying agents to request and review available third-party factory audit reports of direct import suppliers, and to report and disclose any issues contained in those reports to Ross compliance personnel in the Legal department'. The Company also indicates that 'while Ross orders and imports some products directly through its international buying agents and from manufacturers, they represent the minority of merchandise sold in our stores'. [Product Sourcing and Human Rights] <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Describes corrective action process</li> <li>• Not met: Example of corrective action</li> <li>• Not met: Discloses % of supply chain monitored</li> </ul> </li></ul>
B.1.7	Engaging business relationships	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: HR affects selection of suppliers</li> <li>• Not met: HR affects on-going supplier relationships: The Company states in the Product Sourcing and Human Rights document that 'If Ross becomes aware that any vendor has been found to be out of compliance with Ross' requirements or procedures regarding the above, including any applicable local, national, or international labor or human trafficking laws, Ross will take appropriate responsive action, which could include suspending all shipments of a vendor's merchandise and terminating the business relationship.' However, this process only seems to apply to a small part of its suppliers. [Product Sourcing and Human Rights] <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both requirement under score 1 met</li> <li>• Not met: Working with suppliers to improve performance</li> </ul> </li></ul>
B.1.8	Approach to engagement with potentially 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"> <li>• Not met: Stakeholder process or systems</li> <li>• Not met: Frequency and triggers for engagement</li> <li>• Not met: workers in the SP engaged</li> <li>• Not met: communities in the SC engaged</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Analysis of stakeholder views and company's actions on them</li> </ul>

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.1	Identifying: Processes and triggers for identifying human rights risks and impacts	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Identifying risks in own operations</li> <li>• Not met: Identifying risks in AP suppliers</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Ongoing global risk identification</li> <li>• Not met: In consultation with stakeholders</li> <li>• Not met: In consultation with HR experts</li> <li>• Not met: Triggered by new circumstances</li> </ul>
B.2.2	Assessing: Assessment of risks and impacts identified (salient risks and key industry risks)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Salient risk assessment (and context)</li> <li>• Not met: Public disclosure of salient risks</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> </ul>
B.2.3	Integrating and Acting: Integrating assessment findings internally and taking appropriate action	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Action Plans to mitigate risks</li> <li>• Not met: Example of Actions decided</li> <li>• Not met: Including in AP supply chain</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> </ul>
B.2.4	Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: System to check if Actions are effective</li> <li>• Not met: Lessons learnt from checking effectiveness</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Both requirement under score 1 met</li> </ul>
B.2.5	Communicating : Accounting for how human rights impacts are addressed	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Comms plan re identifying risks</li> <li>• Not met: Comms plan re assessing risks</li> <li>• Not met: Comms plan re action plans for risks</li> <li>• Not met: Comms plan re reviewing action plans</li> <li>• Not met: Including AP suppliers</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Responding to affected stakeholders concerns</li> <li>• Not met: Ensuring affected stakeholders can access communications</li> </ul>

## C. Remedies and Grievance Mechanisms (15% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.1	Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers	1.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Met: Channel accessible to all workers: The document “Whistle-Blowing” and complaint policy and procedure indicates, concerning the report of violations, that: ‘This policy deals with the receipt, retention and treatment of complaints about accounting, internal controls, auditing matters, or deceptive practices, as well as violations of laws, rules and regulations’. The document also states that ‘The Company has established a procedure to allow employees, customers, or business partners to submit complaints on a confidential and anonymous basis’. This mechanism is accessible to all workers, customers and business partners. [Whistle Blowing and Complaint Policy and Procedures]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Number grievances filed, addressed or resolved</li> <li>• Not met: Channel is available in all appropriate languages</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Met: Expect AP supplier to have equivalent grievance systems: The vendor code of conduct contained within Vendor compliance manual states that: 'Vendors must maintain procedures by which workers may report violations of the standards without fear of reprisal'. The vendor code also indicates that 'Ross has established the general principles below, which represent Ross's minimum expectations and serve only as a starting point for you to evaluate your practices and working conditions and those of your subcontractors'. [Whistle Blowing and Complaint Policy and Procedures]</li> <li>• Met: Opens own system to AP supplier workers: See above</li> </ul>
C.2	Grievance channel(s)/mechanism(s) to receive complaints or concerns from external individuals and communities	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Grievance mechanism for community</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Describes accessibility and local languages</li> <li>• Not met: Expects AP supplier to have community grievance systems</li> <li>• Not met: AP supplier communities use global system</li> </ul>
C.3	Users are involved in the design and performance of the channel(s)/mechanism(s)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Engages users to create or assess system</li> <li>• Not met: Description of how they do this</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Engages with users on system performance</li> <li>• Not met: Provides user engagement example on performance</li> <li>• Not met: AP suppliers consult users in creation or assessment</li> </ul>
C.4	Procedures related to the mechanism(s)/channel(s) are publicly available and explained	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Response timescales</li> <li>• Not met: How complainants will be informed</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Escalation to senior/independent level</li> </ul>
C.5	Commitment to non-retaliation over complaints or concerns made	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Public statement prohibiting retaliation: The Company's "Whistle-Blowing" and Complaint Policy and Procedures document contains a statement of non-retaliation which states: 'It is a violation of federal law to retaliate against any person who provides truthful information to a law enforcement official concerning a possible violation of any federal law. Moreover, the Company will not tolerate any form of retaliation, harassment, or intimidation by any officer, associate, employee, contractor, subcontractor or agent of the Company against an employee because the employee has: Submitted a complaint under this policy; provided information, caused information to be provide, or otherwise assisted in an investigation regarding any conduct which the employee reasonably believes constitutes a violation of laws, rules, regulation or company policies'. The Company code of business conduct contains a commitment on non-discrimination and the vendor code of conduct contains requirements on all ILO core areas. [Whistle Blowing and Complaint Policy and Procedures]</li> <li>• Met: Practical measures to prevent retaliation: In addition, it indicates: 'The Company has established a procedure to allow employees, customers, or business partners to submit complaints on a confidential and anonymous basis.' [Whistle Blowing and Complaint Policy and Procedures]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Has not retaliated in practice</li> <li>• Not met: Expects AG suppliers to prohibit retaliation</li> </ul>
C.6	Company involvement with State-based judicial and non-judicial grievance mechanisms	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Won't impede state based mechanisms</li> <li>• Not met: Complainants not asked to waive rights</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Will work with state based or non judicial mechanisms</li> <li>• Not met: Example of issue resolved (if applicable)</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.7	Remedying adverse impacts 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"> <li>• Not met: Describes how remedy has been provided</li> <li>• Not met: Says how it would remedy key sector risks</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Changes introduced to stop repetition</li> <li>• Not met: Approach to learning from incident to prevent future impacts</li> <li>• Not met: Evaluation of the channel/mechanism</li> </ul>

### D. Performance: Company Human Rights Practices (20% 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"> <li>• Not met: Living wage in supplier code or contracts</li> <li>• Not met: Improving living wage practices of suppliers</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> <li>• Not met: Provide analysis of trends in progress made</li> </ul>
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"> <li>• Not met: Avoids business model pressure on HRs</li> <li>• Not met: Positive incentives to respect human rights</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> </ul>
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"> <li>• Not met: Identifies suppliers back to product source (farm, ranch etc)</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Discloses significant parts of supply chain and why</li> </ul>
D.2.4.b	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"> <li>• Not met: Child Labour rules in codes or contracts: Regarding child labour, the Vendor code of conduct included in the Vendor Compliance manual indicates the following: 'Ross will not continue a relationship with any vendor that uses or permits the use of child labor in any of its facilities. A 'child' is any person who is younger than 15 (or 14, if applicable under the law) or younger than the age for completing compulsory education in a country in which such age is higher than 15'. The Company has not published documents containing further details on child labour in the supply chain, including guidelines about verification of job applicant's age or remediation programmes. [Ross Vendor Compliance Manual, May 2018]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: How working with suppliers on child labour</li> <li>• Not met: Both requirements under score 1 met</li> <li>• Not met: Provide analysis of trends in progress made</li> </ul>
D.2.5.b	Forced labour: Debt bondage and other unacceptable financial 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"> <li>• Not met: Debt and fees rules in codes or contracts</li> <li>• Not met: How working with suppliers on debt &amp; fees</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> <li>• Not met: Provide analysis of trends in progress made</li> </ul>
D.2.5.d	Forced labour: Restrictions on workers (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Free movement rules in codes or contracts</li> <li>• Not met: How these practices are implemented and monitored for agencies, labour brokers or recruiters</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> <li>• Not met: Provide analysis of trends in progress made</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.2.6.b	Freedom of association and collective bargaining (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Not met: FoA &amp; CB rules in codes or contracts: The Company's vendor code of conduct, included in the Vendor Compliance manual contains a requirement regarding freedom of association and collective bargaining that states: 'Vendors must recognize and respect rights of workers to freedom of association and collective bargaining'. The Company has not published documents containing further details on freedom of association and collective bargaining in the supply chain, including the prohibition of intimidation, harassment, retaliation and violence against union members and representatives. [Ross Vendor Compliance Manual, May 2018]</li> <li>Not met: How working with suppliers on FoA and CB</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Not met: Both requirements under score 1 met</li> <li>Not met: Provide analysis of trends in progress made</li> </ul>
D.2.7.b	Health and safety: Fatalities, lost days, injury rates (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Not met: Sets out clear Health and Safety requirements</li> <li>Not met: Injury rate disclosures</li> <li>Not met: Lost days or near miss disclosures</li> <li>Not met: Fatalities disclosures</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Not met: How working with suppliers on H&amp;S</li> <li>Not met: Provide analysis of trends in progress made</li> </ul>
D.2.8.b	Women's rights (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Not met: Women's rights in codes or contracts: The Company's vendor code of conduct, included in the Vendor Compliance manual contains a requirement regarding women's rights that states: 'Vendors must ensure that women are treated equally in all facets of employment'. The Company has not published documents containing further details on women's rights in the supply chain, including the provision of equal pay for equal work, and measures to ensure equal opportunities throughout all levels of employment and to eliminate health and safety concerns that are particularly prevalent among women workers. [Ross Vendor Compliance Manual, May 2018]</li> <li>Not met: How working with suppliers on women's rights</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Not met: Both requirement under score 1 met</li> <li>Not met: Provide analysis of trends in progress made</li> </ul>
D.2.9.b	Working hours (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Not met: Working hours in codes or contracts: Concerning working hours, the Vendor code of conduct contained in the Vendor compliance manual states the following: 'Vendors must operate based on prevailing local work hours and observe applicable laws regarding vacation time, leave period, and holidays. Any time worked beyond the norm must be compensated according to local labor laws'. The Company has not published documents containing further details on working hours in the supply chain, including guidelines to respect for applicable international standards and national laws and regulations concerning maximum hours and minimum breaks and rest periods. [Ross Vendor Compliance Manual, May 2018]</li> <li>Not met: How working with suppliers on working hours</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Not met: Both requirements under score 1 met</li> <li>Not met: Provide analysis of trends in progress made</li> </ul>

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
E(1).0	Serious allegation No 1		No allegations meeting the CHRB severity thresholds were found, and so the score of 4.62 out of 80 points scored in themes A-D & F has been applied to produce a score of 1.15 out of 20 points for theme E.

### F. Transparency (10% of Total)

Indicator Code	Indicator name	Score	Explanation
F.1	Company willingness to publish information	0.7 out of 4	Out of a total of 40 indicators assessed under sections A-D of the benchmark, Ross Stores made data public that met one or more elements of the methodology in 7 cases, leading to a disclosure score of 0.7 out of 4 points.



Indicator Code	Indicator name	Score	Explanation
F.2	Recognised Reporting Initiatives	0 out of 2	The individual elements of the assessment are met or not as follows: Score 2 <ul style="list-style-type: none"> <li>• Not met: Company reports on GRI</li> <li>• Not met: Company reports on SASB</li> <li>• Not met: Company reports on UNGPRF</li> </ul>
F.3	Key, High Quality Disclosures	0 out of 4	Ross Stores met 0 of the 8 thresholds listed below and therefore gets 0 out of 4 points for the high quality disclosure indicator. Specificity and use of concrete examples <ul style="list-style-type: none"> <li>• Not met: Score 2 for A.2.2 : Board discussions</li> <li>• Not met: Score 2 for B.1.6 : Monitoring and corrective actions</li> <li>• Not met: Score 2 for C.1 : Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers</li> <li>• Not met: Score 2 for C.3 : Users are involved in the design and performance of the channel(s)/mechanism(s)</li> </ul> Discussing challenges openly <ul style="list-style-type: none"> <li>• Not met: Score 2 for B.2.4 : Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts</li> <li>• Not met: Score 2 for C.7 : Remedying adverse impacts and incorporating lessons learned</li> </ul> Demonstrating a forward focus <ul style="list-style-type: none"> <li>• Not met: Score 2 for A.2.3 : Incentives and performance management</li> <li>• Not met: Score 2 for B.1.2 : Incentives and performance management</li> </ul>

## Disclaimer

A score of zero for a particular indicator does not mean that bad practices are present. Rather it means that we have been unable to identify the required information in public documentation.

See the 2018 Key Findings report for more details of the research process.

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As CHRB Ltd, we want to emphasise that the results will always be a proxy for good human rights management, and not an absolute measure of performance. This is because there are no fundamental units of measurement for human rights. Human rights assessments are therefore necessarily more subjective than objective. The Benchmark also captures only a snap shot in time. We therefore want to encourage companies, investors, civil society and governments to look at the broad performance bands that companies are ranked within rather than their precise score because, as with all measurements, there is a reasonably wide margin of error possible in interpretation. We also want to encourage a greater analytical focus on how scores improve over time rather than upon how a company compares to other companies in the same industry today. The spirit of the exercise is to promote

continual improvement via an open assessment process and a common understanding of the importance of the UN Guiding Principles on Business and Human Rights.