

Corporate Human Rights Benchmark 2018 Company Scoresheet



Company Name Under Armour
Industry Apparel (Supply Chain only)
Overall Score (*) 30.2 out of 100

Theme Score	Out of	For Theme
0.2	10	A. Governance and Policies
4.7	25	B. Embedding Respect and Human Rights Due Diligence
2.1	15	C. Remedies and Grievance Mechanisms
6.7	20	D. Performance: Company Human Rights Practices
15.0	20	E. Performance: Responses to Serious Allegations
1.6	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 <ul style="list-style-type: none"> • Not met: General HRs commitment • Not met: UNGC principles 1 & 2 • Not met: UDHR • Not met: International Bill of Rights Score 2 <ul style="list-style-type: none"> • 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 <ul style="list-style-type: none"> • Not met: ILO Core: CHRB has not identified any documents in the public domain which provide all the information required to meet this indicator. • Not met: UNGC principles 3-6 • Met: All four ILO for AP suppliers: The Supplier code of conduct contains an explicit commitment to all ILO core standards. Specifically on freedom of association and collective bargaining, the code states that suppliers and subcontractors 'shall recognize and respect the right of employees to freedom of association and collective bargaining' [Supplier code of conduct: files.shareholder.com] Score 2 <ul style="list-style-type: none"> • Not met: All four ILO Core

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not met: Respect H&S of workers: The Company refers to workplace safety in the context of workplace violence. [Code of conduct: uabiz.com] • Met: H&S applies to AP suppliers: The supplier code of conduct contains a statement on health and safety in the workplace [Supplier code of conduct: files.shareholder.com] • Not met: working hours for employees • Met: Working hours for AP suppliers: The supplier code of conduct contains a statement on hours of work including regular working hours, overtime, and time for rest. [Supplier code of conduct: files.shareholder.com]
A.1.3.AP	Commitment to respect human rights particularly relevant to the industry (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: Women's Rights • Not met: Children's Rights • Not met: Migrant worker's rights • Not met: Expecting suppliers to respect these rights <p>Score 2</p> <ul style="list-style-type: none"> • Not met: CEDAW/Women's Empowerment Principles • Not met: Child Rights Convention/Business principles • Not met: Convention on migrant workers • Not met: Respecting the right to water • Not met: Expecting suppliers to respect these rights
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"> • Not met: Commits to stakeholder engagement: CHR B has not identified any documents in the public domain which provide all the information required to meet this indicator. • Not met: Regular stakeholder engagement: CHR B has not identified any documents in the public domain which provide all the information required to meet this indicator. <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Commits to engage stakeholders in design • Not met: Regular stakeholder design engagement
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"> • Not met: Commits to remedy: Although in case of non-compliance from suppliers the Company implements remediation plans, no evidence found of a public statement of commitment to remedy the adverse impacts on individuals, workers and communities that it has caused or contributed to. [Remediation and capacity building on website: files.shareholder.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Not obstructing access to other remedies: CHR B has not identified any documents in the public domain which provide all the information required to meet this indicator. • Not met: Collaborating with other remedy initiatives • Not met: Work with AP suppliers to remedy impacts
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"> • Not met: Zero tolerance attacks on HRs Defenders (HRDs): CHR B has not identified any documents in the public domain which provide all the information required to meet this indicator. <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Expects AP suppliers to reflect company HRD commitments: CHR B has not identified any documents in the public domain which provide all the information required to meet this indicator.

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"> • Not met: CEO or Board approves policy: CHR B has not identified any documents in the public domain which provide all the information required to meet this indicator. • Not met: Board level responsibility for HRs: CHR B has not identified any documents in the public domain which provide all the information required to meet this indicator.

Indicator Code	Indicator name	Score (out of 2)	Explanation
			Score 2 <ul style="list-style-type: none"> Not met: Speeches/letters by Board members or CEO: CHRB has not identified any documents in the public domain which provide all the information required to meet this indicator.
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"> Not met: Board/Committee review of salient HRs: CHRB has not identified any documents in the public domain which provide all the information required to meet this indicator. Not met: Examples or trends re HR discussion: CHRB has not identified any documents in the public domain which provide all the information required to meet this indicator. Score 2 <ul style="list-style-type: none"> Not met: Both examples and process
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: Incentives for at least one board member: CHRB has not identified any documents in the public domain which provide all the information required to meet this indicator. Not met: At least one key AP HR risk, beyond employee H&S Score 2 <ul style="list-style-type: none"> Not met: Performance criteria made public

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	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: Senior responsibility fo HR (inc ILO): In the Know the Chain response, the Company indicates that the 'Sustainability team is primarily responsible for the implementation of policies and standards related to human trafficking and forced labour. The team is led by the Vice President of Sustainability and Corporate Social Responsibility and Managing Counsel, who reports to Under Armour's General Counsel'. However, no evidence found of commitment to all ILO core areas in the Company's policies regarding its own operations. [Know the Chain 2016, 2016: business-humanrights.org] Score 2 <ul style="list-style-type: none"> Met: Day-to-day responsibility: In addition to the role of the VP of Sustainability, the Company indicates in the Know the Chain Response that 'Under Armour's Sustainability Council, which is cross-functional committee comprised of senior and operationally responsible Business Unit leaders, including those from Sourcing, Supply Chain and Materials, meets periodically and is, among other things, charged with periodic reviews of issues, risks, findings and trends from and related to assessments of manufacturers for compliance with laws, the Codes and the benchmarks and seeking to incorporate process and operational improvements based upon the results of its Sustainability program and related due diligence efforts'. Finally, the sustainability team 'has staff based in Central America, South-East Asia, and in the United States including those based in Under Armour's global corporate headquarters in Baltimore, Maryland. While the Sustainability team leads Under Armour's efforts to ensure that human rights are upheld throughout its supply chain'. [Know the Chain 2016, 2016: business-humanrights.org] Met: Day-to-day responsibility in supply chain: As explained above, the Sustainability council and Sustainability team's duties include supply chain. The code for suppliers covers all ILO core areas. [Know the Chain 2016, 2016: business-humanrights.org]
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 for human rights: CHRB has not identified any documents in the public domain which provide all the information required to meet this indicator. Not met: At least one key AP HR risk, beyond employee H&S: CHRB has not identified any documents in the public domain which provide all the information required to meet this indicator. Score 2 <ul style="list-style-type: none"> Not met: Performance criteria made public

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.3	Integration with enterprise risk management	0	The individual elements of the assessment are met or not as follows: Score 1 • Not met: HR part of enterprise risk system Score 2 • Not met: Audit Ctte or independent risk assessment
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 • Not met: Communicates its policy to all workers in own operations Score 2 • Not met: Communication of policy commitments to stakeholder • Not met: How policy commitments are made accessible to audience
B.1.4.b	Communication /dissemination of policy commitment(s) to business relationships	0.5	The individual elements of the assessment are met or not as follows: Score 1 • Met: Steps to communicate policy commitments to BRs: The Company indicates that it 'requires to suppliers to post the FLA and under Armour codes in the languages understood by their teammates, including their managers and workers'. In addition, it also requires 'assessors to assess whether, and to confirm to Under Armour's Sustainability team that, the FLA and Under Armour codes are posted. [Approach to labor practices on website: files.shareholder.com] • Not met: Including to AP suppliers Score 2 • Met: How HR commitments made binding/contractual: The Company states in the 'know the chain' questionnaire that: 'Under Armour contractually requires suppliers to abide by the FLA and Under Armour Codes of Conduct and the FLA's benchmarks'. [Know the Chain 2016, 2016: business-humanrights.org] • Not met: Including on AP suppliers
B.1.5	Training on Human Rights	0	The individual elements of the assessment are met or not as follows: Score 1 • Not met: Trains all workers on HR policy commitments: The Company states in the 'know the chain' response that 'members of the Sustainability team attend trainings and webinars including those held by industry leaders on topics related to current industry related labour issues and risks - including those related to human trafficking and forced labour. Under Armour audits suppliers in accordance with the FLA's Sustainable Compliance Initiative, uses FLA audit instruments and assessment tools which feature questions regarding the employment of migrant workers and assess forced labour human trafficking and other risks, policies, standards, and noncompliance. Under Armour's Sustainability team conducts biannual trainings on its assessment methodology for all auditors who conduct Under Armour's supplier assessments. The Sustainability team also sends its auditors materials on region-specific labour issues for individual areas where the assessed facilities are based'. • Not met: Trains relevant managers including procurement: The Company indicated in the Know the Chain response that 'We are currently developing training for other departments at Under Armour that have close working relationships with the supply chain on how to recognize risks in select areas', however, no evidence found of the Company training procurement teams on human rights issues. [Know the Chain 2016, 2016: business-humanrights.org] Score 2 • Not met: Both requirements under score 1 met [Know the Chain 2016, 2016: business-humanrights.org]
B.1.6	Monitoring and corrective actions	0.5	The individual elements of the assessment are met or not as follows: Score 1 • Not met: Monitoring implementation of HR policy commitments: The Company indicates that it 'audits all Tier 1 facilities and certain Tier 2 suppliers, including some that produce licensed goods. For Tier 2 and beyond, as part of our Beyond Tier 1 (BT1) initiative, we will over time prioritize for assessment facilities that produce high volumes of materials for Under Armour'. It also states that 'we engage third-party assessment firms and assessors, some of which are FLA-accredited to evaluate suppliers. The FLA also conducts assessments of some of our factories, amounting to about 5% of applicable suppliers each year'. 'Under armour's sustainability department also conducts periodic refresher and new training for field assessors and sustainability team staff'. However, no evidence found in relation to monitoring own operations, and the code for own operations covering all ILO core areas. [Monitoring assessment on website: files.shareholder.com] • Met: Monitoring AP suppliers: The Company indicates that it 'audits all Tier 1 facilities and certain Tier 2 suppliers, including some that produce licensed goods.

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>For Tier 2 and beyond, as part of our Beyond Tier 1 (BT1) initiative, we will over time prioritize for assessment facilities that produce high volumes of materials for Under Armour'. It also states that 'we engage third-party assessment firms and assessors, some of which are FLA-accredited to evaluate suppliers. The FLA also conducts assessments of some of our factories, amounting to about 5% of applicable suppliers each year'. 'Under armour's sustainability department also conducts periodic refresher and new training for field assessors and sustainability team staff'. [Monitoring assessment on website: files.shareholder.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Describes corrective action process: The Company states that 'our focus on Sustainable compliance includes an emphasis on conducting, through a documented process, a Root Cause Analysis (RCA) of reported issues. This may be done in collaboration with a variety of stakeholders [...]. This analysis informs the way in which we write or Management Action Plans (MAPs) and engage in dialogue with factories about how they will improve performance in identified areas'. It also indicates that 'suppliers respond to the MAP with their own plan to address the action items identified in it, as well as by sending supporting materials showing how they are working to address them. The sustainability teams then reviews' suppliers corrective actions by engaging with them during the follow-up process in subsequent assessments and/or visits'. However, no evidence found of the Company reporting numbers of incidence. [Monitoring assessment on website: files.shareholder.com] • Not met: Example of corrective action: CHRb has not identified any documents in the public domain which provide all the information required to meet this indicator. • Not met: Discloses % of supply chain monitored: The Company states that audits all tier 1 facilities and certain tier 2 suppliers. However, no evidence found on the percentage of the supply chain that these factories and suppliers represent. [Monitoring assessment on website: files.shareholder.com]
B.1.7	Engaging 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"> • Not met: HR affects selection of suppliers: The Company indicates in the 'know the chain' questionnaire that 'Under Armour's Sustainability team's practice is to engage a third-party assessment firm or assessors to conduct an initial factory assessment prior to placing production orders. This assessment includes a comprehensive review of supplier practices, including the accurate payment of wages, review of issues and risks of, forced labour, and the Dhaka Principles for Migration with Dignity (the 'Dhaka Principles'). Under Armour's assessment tools include FLA assessment tools, the SCI methodology and benchmarks and questions regarding the employment of migrant workers and aspects of the Dhaka Principles'. However, the Company does not indicate how this is taken into account (how this affects) in the selection of potential business relationships. [Know the Chain 2016, 2016: business-humanrights.org] • Met: HR affects on-going supplier relationships: The Code for suppliers states that 'Any violation of these laws or the Code may be viewed as a breach of the Manufacturing Agreement and could lead to the termination of the business relationship between Under Armour and the supplier' [Supplier code of conduct: files.shareholder.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirement under score 1 met • Not met: Working with suppliers to improve performance: The Company indicates that learning from assessments about areas in which suppliers need to improve their performance, it provides guidance, training, educational materials and in certain cases support financially the cost of capacity-building programmes. However, no evidence found of any examples. [Remediation and capacity building on website: files.shareholder.com]
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"> • Not met: Stakeholder process or systems: CHRb has not identified any documents in the public domain which provide all the information required to meet this indicator. • Not met: Frequency and triggers for engagement: CHRb has not identified any documents in the public domain which provide all the information required to meet this indicator. • Not met: workers in the SP engaged • Not met: communities in the SC engaged <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Analysis of stakeholder views and company's actions on them

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	0.5	<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: Identifying risks in own operations: The Company indicates that 'our sustainability team has added human rights due diligence tool to assess, on a country level, risks and issues including those related to ILO core conventions. This tool draws data and analysis from an array of sources, including CSO [Civil Society Organisation] and governmental reporting and analysis. For example, our Sustainability team uses this analysis when Under Armour considers sourcing from new countries. We also incorporate information from HRDD into Under Armour's assessment Management Action Plans. In 2015 and 2016, we also surveyed our assessment and training partners to identify suppliers that could be considered at significant risk for four critical issues [...] restrictions on the freedom of association and collective bargaining, forced or compulsory labour, and child and juvenile workers exposed to hazardous work'. It is not clear, however, whether this identification and assessment process applies to the Company's own operations. [Remediation and capacity building on website: files.shareholder.com] • Met: Identifying risks in AP suppliers: See above <p>Score 2</p> <ul style="list-style-type: none"> • Met: Ongoing global risk identification: See above • Met: In consultation with stakeholders: See above • Not met: In consultation with HR experts • Met: Triggered by new circumstances: As indicated above, the Company's Sustainability team uses this analysis when Under Armour considers sourcing from new countries.
B.2.2	Assessing: Assessment of risks and impacts identified (salient risks and key industry risks)	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: Salient risk assessment (and context): Following the identification work mentioned, the Company indicates that 'we worked to understand better how different audit findings for these five issues may suggest, or contribute to, risk – along the country or region where the factory is located. At a high-level, there were some indications [...] that in some cases, risk may relate as much, if not more, to a factory's location than to the type of manufacturing process it performs. Our team also considered whether historical or other information could clarify whether certain locations have heightened risk profiles for non-compliance with other FLA benchmarks. We have also analysed history risk by country, with the goal of devoting additional attention in ongoing Sustainability team work and engagement to potentially higher risk areas'. • Not met: Public disclosure of salient risks: The Company indicates that freedom of association and collective bargaining 'may present a risk where we should be extra watchful as we evaluate potential 2017 vendors, and we may need to be specially focused on whether that risk is higher in certain countries. However, no further details found [Remediation and capacity building on website: files.shareholder.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met
B.2.3	Integrating and Acting: Integrating assessment findings internally and taking appropriate action	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: Action Plans to mitigate risks • Not met: Example of Actions decided • Not met: Including in AP supply chain <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met
B.2.4	Tracking: Monitoring and evaluating 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: System to check if Actions are effective • Not met: Lessons learnt from checking effectiveness <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirement under score 1 met

Indicator Code	Indicator name	Score (out of 2)	Explanation
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"> • Not met: Comms plan re identifying risks • Not met: Comms plan re assessing risks • Not met: Comms plan re action plans for risks • Not met: Comms plan re reviewing action plans • Not met: Including AP suppliers Score 2 <ul style="list-style-type: none"> • Not met: Responding to affected stakeholders concerns • Not met: Ensuring affected stakeholders can access communications

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"> • Met: Channel accessible to all workers: The code of conduct describes how to report concerns for all workers in the code of conduct [Code of conduct: uabiz.com] Score 2 <ul style="list-style-type: none"> • Not met: Number grievances filed, addressed or resolved • Not met: Channel is available in all appropriate languages • Not met: Expect AP supplier to have equivalent grievance systems • Met: Opens own system to AP supplier workers: The Code of conduct for suppliers indicates that 'suppliers and subcontractors and their employees may report violations of this code to Under Armour's Hotline electronically and/or suppliercode@underarmour.com. The hotline is monitored 24 hours a day, seven days a week'. [Supplier code of conduct: files.shareholder.com]
C.2	Grievance channel(s)/mechanism(s) to receive complaints or concerns from 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 for community: Regarding operation of its manufacturing suppliers, the Company indicates in the 'know the chain' questionnaire 'we periodically receive grievances directly from workers and/or groups that work with and/or represent them including labour rights organizations and trade unions and/or through the Fair Labour Association and/or other brands with which we collaborate to address issues raised'. However, it has not disclosed any public documents with further details on mechanisms to receive complaints from external individuals and communities. [Know the Chain 2016, 2016: business-humanrights.org] Score 2 <ul style="list-style-type: none"> • Not met: Describes accessibility and local languages • Not met: Expects AP supplier to have community grievance systems • Not met: AP supplier communities use global system
C.3	Users are involved in the design and performance of the channel(s)/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: Engages users to create or assess system • Not met: Description of how they do this Score 2 <ul style="list-style-type: none"> • Not met: Engages with users on system performance • Not met: Provides user engagement example on performance • Not met: AP suppliers consult users in creation or assessment
C.4	Procedures related to the mechanism(s)/channel(s) are publicly available and explained	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Response timescales: The Company indicates that 'Under Armour's Sustainability team receives workers' grievances directly from workers, through assessment firms and, sometimes, through the FLA or other factory customer with which we collaborate. In certain cases, we have required factories to engage a third-party hotline/survey provider to receive grievances and obtain anonymous survey data about workplace conditions'. 'When Under Armour receives worker grievances, we investigate them and take action, including asking suppliers to remedy issues. We work directly with the manufacturer to find a solution, or we may engage 3rd parties, including the FLA, to conduct investigations or to support the factory in resolving them. We have sometimes serves as intermediary between workers and management when they are in conflict'. [Monitoring assessment on website: files.shareholder.com] • Not met: How complainants will be informed Score 2 <ul style="list-style-type: none"> • Met: Escalation to senior/independent level: As indicated above, when the Company receives worker grievances, 'We work directly with the manufacturer to

Indicator Code	Indicator name	Score (out of 2)	Explanation
			find a solution, or we may engage 3rd parties, including the FLA, to conduct investigations or to support the factory in resolving them. We have sometimes serves as intermediary between workers and management when they are in conflict'. [Monitoring assessment on website: files.shareholder.com]
C.5	Commitment to non-retaliation over complaints or concerns made	0.5	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: Both in the code of conduct for employees and the code of conduct for suppliers the Company includes non-retaliation commitments. However, although the Company indicates in the know the Chain response that it also receives grievances from other third-parties, it is not clear through which channels they come, and whether there's a commitment to non-retaliation. [Supplier code of conduct: files.shareholder.com & Know the Chain 2016, 2016: business-humanrights.org] Met: Practical measures to prevent retaliation: The Company's code [company's mechanisms are open to suppliers] that 'the hotline and website allow you the option to report anonymously'. Score 2 <ul style="list-style-type: none"> Not met: Has not retaliated in practice Not met: Expects AG suppliers to prohibit retaliation
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: Won't impede state based mechanisms: CHRB has not identified any documents in the public domain which provide all the information required to meet this indicator. Not met: Complainants not asked to waive rights: CHRB has not identified any documents in the public domain which provide all the information required to meet this indicator. Score 2 <ul style="list-style-type: none"> Not met: Will work with state based or non judicial mechanisms Not met: Example of issue resolved (if applicable)
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"> Not met: Describes how remedy has been provided: CHRB has not identified any documents in the public domain which provide all the information required to meet this indicator. Not met: Says how it would remedy key sector risks: CHRB has not identified any documents in the public domain which provide all the information required to meet this indicator. Score 2 <ul style="list-style-type: none"> Not met: Changes introduced to stop repetition: CHRB has not identified any documents in the public domain which provide all the information required to meet this indicator. Not met: Approach to learning from incident to prevent future impacts: CHRB has not identified any documents in the public domain which provide all the information required to meet this indicator. Not met: Evaluation of the channel/mechanism: CHRB has not identified any documents in the public domain which provide all the information required to meet this indicator.

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"> Not met: Living wage in supplier code or contracts: However, the code for suppliers states that 'every worker has a right to compensation for a regular work that is sufficient to meet the worker's basic needs and provide some discretionary income. Employers shall pay at least the minimum wage or the appropriate prevailing wage'. [Supplier code of conduct: files.shareholder.com] Not met: Improving living wage practices of suppliers Score 2 <ul style="list-style-type: none"> Not met: Both requirements under score 1 met Not met: Provide analysis of trends in progress made

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.2.2	Aligning purchasing decisions with 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"> • Met: Avoids business model pressure on HRs: The Company indicates in the 'know the chain' response that 'Under Armour's Sustainability department's headquarter team members are deliberately located on, and within, the same floor and same area, as key supply chain sourcing team leaders and members. The Sustainability team provides up-to-date information about suppliers' social and environmental compliance to corresponding sourcing personnel and seeks to work with them and new facility on boarding personnel as part of an integrated and cross-functional effort to avoid purchasing practices that increase the risk of human trafficking and forced labour in the supply chain (e.g. short-term contracts, excessive downward pressure on pricing, sudden changes of workload). Among other instances, these issues are addressed in the Sustainability Council meetings and meetings with other internal and external Under Armour Employees, manufacturers and licensees, among others. This enables the Sustainability and Sourcing teams to collaborate and to seek to work with manufacturing business partners that over time strive to perform better on key labour and other rights performance indicators'. [Know the Chain 2016, 2016: business-humanrights.org] • Not met: Positive incentives to respect human rights <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met
D.2.3	Mapping and disclosing the supply chain	2	<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: Identifies suppliers back to product source (farm, ranch etc): The company indicates that 'we have committed to disclose, over time, and on our website, suppliers who form the essential links in our supply chain, starting in March 2017 with Strategic Supplier Tier 1 (assembly locations) and specialty vendors that are estimated to account for 70% of our business). [Approach to labor practices on website: files.shareholder.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Discloses significant parts of supply chain and why: As indicated above, the Company indicates that the disclosed list includes strategic supplier Tier 1 and specialty vendors accounting for over 70% of its business [Supply chain list, 03/2017: files.shareholder.com]
D.2.4.b	Child labour: Age verification and corrective actions (in the supply chain)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Child Labour rules in codes or contracts • Not met: How working with suppliers on child labour <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met • Not met: Provide analysis of trends in progress made
D.2.5.b	Forced labour: Debt bondage and other unacceptable financial costs (in the supply chain)	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: Debt and fees rules in codes or contracts: The Company indicates in the Know the chain response that 'every Under Armour social and environmental assessment requires assessment firms to review whether, and how, suppliers work with recruitment agencies. If the use of recruitment agencies is found, Under Armour's assessment firms are directed to report on the nature and type of recruitment fees. All violations of the Under Armour and the FLA code and benchmarks are expected to be documented in order that Under Armour can address them directly with the supplier and to work with it, so that it may improve and remediate conditions, as needed, and over time'. It also indicates in this questionnaire that 'the assessment tools and reports address risks related to the employment of migrant workers including passport retention, wage payment, recruitment fees, deductions from pay, expenses, etc.'. [Know the Chain 2016, 2016: business-humanrights.org] • Not met: How working with suppliers on debt & fees <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met • Not met: Provide analysis of trends in progress made

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.2.5.d	Forced labour: Restrictions on workers (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: Free movement rules in codes or contracts: The Company indicates in the 'know the chain' questionnaire that 'if the use of a recruitment agency is found, assessment firms are expected to report to Under Armour on risks posed by the agency's practices and Under Armour engages with manufacturers about related issues. The assessment tools and reports address risks related to the employment of migrant workers including passport retention, wage payment, recruitment fees, deductions from pay, expenses, etc.' However, no evidence found of guidelines on workers' freedom of movement beyond the case of suppliers using recruiting agencies. [Know the Chain 2016, 2016: business-humanrights.org] • Not met: How these practices are implemented and monitored for agencies, labour brokers or recruiters <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met • Not met: Provide analysis of trends in progress made
D.2.6.b	Freedom of association and collective bargaining (in the supply chain)	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"> • Not met: FoA & CB rules in codes or contracts: The Company's code of conduct for suppliers states that 'Under Armour suppliers and their subcontractors shall recognize and respect the right of employees to freedom of association and collective bargaining'. However, no further evidence found of on specific requirements on prohibition of intimidation or retaliation against union members or representatives'. [Supplier code of conduct: files.shareholder.com] • Met: How working with suppliers on FoA and CB: The Company indicates in the Know the Chain response that 'in Management Action Plans, we require manufacture to develop and improve, as needed, and over time, Industrial Relations policies and procedures and systems that are aimed at ensuring compliance with applicable laws, code provisions and benchmarks. Within and/or in connection with our Management Action Plans for assessments, we encourage manufacturers to ensure workplace free of interference and retaliation. We also contractually require manufactures to abide by the Under Armour Code and the FLA Code and related benchmarks that require the recognition and respect of workers' legal rights to Freedom of Association and Collective Bargaining. We require manufacturers to post versions of the FLA and Under Armour Codes of conduct in the languages understood by their employees and managers. We encourage manufacturers to ensure a workplace free of interference and retaliation of any form. In certain cases, manufacturers may benefit from additional expertise, resources, or structure, so we may require a factory's management to hire a third-party firm to conduct focused, short-term training and capacity building. Finally, we have engaged in a pilot project involving specific and focused procedures, mechanisms and structures aimed at supporting worker feedback to, and participation with, factory management to address possible/reported structure or local issues or challenges'. [Know the Chain 2016, 2016: business-humanrights.org] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met • Not met: Provide analysis of trends in progress made
D.2.7.b	Health and safety: Fatalities, lost days, injury rates (in the supply chain)	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: Sets out clear Health and Safety requirements: The code for suppliers includes explicit guidelines on health and safety. These include complying with rules and laws, to have policies and procedures, train employees, residential housing, etc. [Supplier code of conduct: files.shareholder.com] • Not met: Injury rate disclosures • Not met: Lost days or near miss disclosures • Not met: Fatalities disclosures <p>Score 2</p> <ul style="list-style-type: none"> • Met: How working with suppliers on H&S • Not met: Provide analysis of trends in progress made
D.2.8.b	Women's rights (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: Women's rights in codes or contracts: CHRb has not identified any documents in the public domain which provide all the information required to meet this indicator. • Not met: How working with suppliers on women's rights: CHRb has not identified any documents in the public domain which provide all the information required to meet this indicator.

Indicator Code	Indicator name	Score (out of 2)	Explanation
			Score 2 <ul style="list-style-type: none"> • Not met: Both requirement under score 1 met • Not met: Provide analysis of trends in progress made
D.2.9.b	Working hours (in the supply chain)	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Working hours in codes or contracts: The Company states in the code of conduct for suppliers that 'suppliers and their subcontractors shall not require workers to work more than the regular and overtime hours allowed by the law of the country where the workers are employed. The regular work week shall not exceed 48 hours. Under armour suppliers and their subcontractors shall allow workers at least 24 consecutive hours of rest in every seven-day period'. • Not met: How working with suppliers on working hours Score 2 <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met • Not met: Provide analysis of trends in progress made

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: Trade union rights in the supply chain • Headline: Illegal firings or forced resignation at Petrallex, Honduras • Sources: FLA report, 11/04/2015 - fairlabor.org • Allegation: The Fair Labour Association (FLA) has alleged that between November 2014 and March 2015, the Petrallex factory in Villanueva, Honduras, illegally fired or forced the resignations of at least 19 garment workers. They included nine SitraPetrallex union leaders and 10 union affiliates or relatives of union leaders, according to an independent investigation by the FLA in April 2015. Petrallex manufactures garments for Gear for Sports Inc. (which includes Under Armour under a licensee agreement) as well for other retailers.
E(1).1	The Company has responded publicly to the allegation	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Public response available: As far as CHRB has been able to ascertain, the Company has not responded publicly to these allegations. However, the FLA reported that FLA-affiliated companies sourcing from Petrallex had agreed to waive their own assessment of the allegations and allow the FLA to investigate. Score 2 <ul style="list-style-type: none"> • Not met: Response goes into detail
E(1).2	The Company has appropriate policies in place	2	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Company policies address the general issues raised • Met: Policies apply to the type of business relationships involved Score 2 <ul style="list-style-type: none"> • Met: Policies address the specific rights in question: The Company has a supplier code of conduct which covers both collective bargaining and freedom of association. <p>The Company has published its Code of Conduct for Suppliers on the corporate website. The Code states: 'Under Armour suppliers and their subcontractors shall recognize and respect the right of employees to freedom of association and collective bargaining.' The Company conducts monitoring of its suppliers through internal inspections and via independent third-party monitoring firms, and states that it 'reserves the right to take appropriate action against entities that fail to meet their legal or contractual responsibilities or to take adequate action to address reported issues.'</p>
E(1).3	The Company has taken appropriate action	2	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Engages with affected stakeholders: Petrallex, according to the June 2015 WRC letter, has engaged with affected stakeholders. Indeed, it indicated that 'On May 21, the union and Petrallex management finalized a written agreement in which the company committed to take key specific remedial actions called for in the joint remediation plan and to continue meeting regularly to agree on, and implement, additional steps to satisfy the remaining elements of the plan. The fact that the company and the union have begun, and continued, meetings to discuss the remediation plan is, in itself, a significant step forward, given the factory's history of refusing to engage with the union'. It added: 'As part of the union-management agreement, the factory committed to reinstate the workers who were terminated or pressured to resign in retaliation for their own or their family members' union activity. Fifteen workers chose to take advantage of this opportunity to return to the factory; the union reports that all fifteen are now

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>back on the job. Factory management also committed not to engage in any further retaliation against workers for union activity, to provide the union with a bulletin board at the factory to post union messages and information, and to provide union leaders with paid leave to engage in union activities'. Source : workersrights-test.org .</p> <ul style="list-style-type: none"> • Met: Provides remedies to affected stakeholders: A remediation plan is in place according to the WRC letter, dated June 2015. According to the WRC letter, it includes, amongst other: 'the company developed a statement regarding its respect for freedom of association, in consultation with the union. The statement was read over the factory's public address system, read to each production line by its supervisors, and posted on bulletin boards'; 'the union further reports that they are in the process of planning the recommended freedom of association trainings'; reinstatement of 15 workers, 'each worker who returned to work received some amount of money. Most of the workers, who had received severance benefits at the time that they were terminated, received 4,000 lempiras (USD 184) at the time of reinstatement. Five workers who did not receive severance benefits at the time of termination received larger payments when they were reinstated; the WRC has not been provided with detailed calculations as to how these payments were determined. In addition, two workers who elected not to return to the factory did not receive even partial back pay'. • Met: Has improved systems and engaged affected stakeholders: The Company has joined relevant initiatives dealing with supply chain labour standards in its sector – the Fair Labor Association and Social Accountability International. The Company has joined relevant initiatives dealing with supply chain labour standards in its sector. In addition, Petralex, the supplier has begun regular meetings 'to agree on, and implement, additional steps to satisfy the remaining elements of the plan'. According to the WRC 'The fact that the company and the union have begun, and continued, meetings to discuss the remediation plan is, in itself, a significant step forward, given the factory's history of refusing to engage with the union.' <p>Score 2</p> <ul style="list-style-type: none"> • Met: Remedies are satisfactory to the victims • Met: Has improved systems and engaged affected stakeholders

F. Transparency (10% of Total)

Indicator Code	Indicator name	Score	Explanation
F.1	Company willingness to publish information	1.6 out of 4	Out of a total of 40 indicators assessed under sections A-D of the benchmark, Under Armour made data public that met one or more elements of the methodology in 16 cases, leading to a disclosure score of 1.6 out of 4 points.
F.2	Recognised Reporting Initiatives	0 out of 2	<p>The individual elements of the assessment are met or not as follows: Score 2</p> <ul style="list-style-type: none"> • Not met: Company reports on GRI: CHRB has not identified any documents in the public domain which provide all the information required to meet this indicator. • Not met: Company reports on SASB: CHRB has not identified any documents in the public domain which provide all the information required to meet this indicator. • Not met: Company reports on UNGPRF: CHRB has not identified any documents in the public domain which provide all the information required to meet this indicator.
F.3	Key, High Quality Disclosures	0 out of 4	<p>Under Armour 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</p> <ul style="list-style-type: none"> • Not met: Score 2 for A.2.2 : Board discussions • Not met: Score 2 for B.1.6 : Monitoring and corrective actions • Not met: Score 2 for C.1 : Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers • Not met: Score 2 for C.3 : Users are involved in the design and performance of the channel(s)/mechanism(s) Discussing challenges openly • Not met: Score 2 for B.2.4 : Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts • Not met: Score 2 for C.7 : Remedying adverse impacts and incorporating lessons learned <p>Demonstrating a forward focus</p>

Indicator Code	Indicator name	Score	Explanation
			<ul style="list-style-type: none"> • Not met: Score 2 for A.2.3 : Incentives and performance management • Not met: Score 2 for B.1.2 : Incentives and performance management

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.

The Benchmark is made available on the express understanding that it will be used solely for general information purposes. The material contained in the Benchmark should not be construed as relating to accounting, legal, regulatory, tax, research or investment advice and it is not intended to take into account any specific or general investment objectives. The material contained in the Benchmark does not constitute a recommendation to take any action or to buy or sell or otherwise deal with anything or anyone identified or contemplated in the Benchmark. Before acting on anything contained in this material, you should consider whether it is suitable to your particular circumstances and, if necessary, seek professional advice. The material in the Benchmark has been put together solely according to the CHRB methodology and not any other assessment models in operation within any of the project partners or EIRIS Foundation as provider of the analyst team.

No representation or warranty is given that the material in the Benchmark is accurate, complete or up-to-date. The material in the Benchmark is based on information that we consider correct and any statements, opinions, conclusions or recommendations contained therein are honestly and reasonably held or made at the time of publication. Any opinions expressed are our current opinions as of the date of the publication of the Benchmark only and may change without notice. Any views expressed in the Benchmark only represent the views of CHRB Ltd, unless otherwise expressly noted.

While the material contained in the Benchmark has been prepared in good faith, neither CHRB Ltd nor any of its agents, representatives, advisers, affiliates, directors, officers or employees accept any responsibility for or make any representation or warranty (either express or implied) as to the truth, accuracy, reliability or completeness of the information contained in this Benchmark or any other information made available in connection with the Benchmark. Neither CHRB Ltd nor any of its agents, representatives, advisers, affiliates, directors, officers and employees undertake any obligation to provide the users of the Benchmark with additional information or to update the information contained therein or to correct any inaccuracies which may become apparent (save as to the extent set out in CHRB Ltd's appeals procedure). To the maximum extent permitted by law any responsibility or liability for the Benchmark or any related material is expressly disclaimed provided that nothing in this disclaimer shall exclude any liability for, or any remedy in respect of, fraud or fraudulent misrepresentation. Any disputes, claims or proceedings this in connection with or arising in relation to this Benchmark will be governed by and construed in accordance with English law and submitted to the exclusive jurisdiction of the courts of England and Wales.

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.