

Corporate Human Rights Benchmark 2018 Company Scoresheet



Company Name Wesfarmers
Industry Agricultural Products (Supply Chain and Own Operations)
Overall Score (*) 27.6 out of 100

Theme Score	Out of	For Theme
4.0	10	A. Governance and Policies
6.9	25	B. Embedding Respect and Human Rights Due Diligence
2.1	15	C. Remedies and Grievance Mechanisms
4.9	20	D. Performance: Company Human Rights Practices
5.5	20	E. Performance: Responses to Serious Allegations
4.2	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	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: General HRs commitment: Wesfarmers acknowledges it's role and responsibility in seeking to safeguard human rights through ethical and sustainable business practices. [Wesfarmers Human Rights and Modern Slavery Statement, 2017: 2017.sustainability.wesfarmers.com.au] <p>Score 2</p> <ul style="list-style-type: none"> Met: UNGPs: Wesfarmers is committed to respecting and supporting globally recognised declarations, principles and goals. These include the United Nations Guiding Principles on Business and Human Rights (UNGP). [Wesfarmers Human Rights and Modern Slavery Statement, 2017: 2017.sustainability.wesfarmers.com.au] Not met: OECD
A.1.2	Commitment to respect the human rights of workers	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: ILO Core: The Company's Ethical Sourcing Policy states that divisions and business units are contractually required to take all reasonable steps to comply with the minimum standards set out in the Annexure A (minimum standards). These minimum standards include the ILOs standards; no forced labour, no child labour, no discrimination and freedom of association and collective bargaining. [Ethical Sourcing Policy, 2016: wesfarmers.com.au] Met: UNGC principles 3-6

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Met: All four ILO for AG suppliers: Wesfarmers will only work will suppliers who take the reasonable steps to comply with the Company's minimum standards. These minimum standards include no forced or bonded labour, no child labour, freedom of association (which includes collective bargaining) and no discrimination and form the ILO's core labour standards. [Wesfarmers Human Rights and Modern Slavery Statement, 2017: 2017.sustainability.wesfarmers.com.au] <p>Score 2</p> <ul style="list-style-type: none"> • Met: All four ILO Core: The Company's Human rights and modern slavery statement states that Wesfarmers is committed to respecting and supporting the International Labour Organisations declaration of Fundamental Principles and Rights at Work. This includes working only with suppliers who take the reasonable steps to comply with all 4 of the ILO's core labour standards. [Wesfarmers Human Rights and Modern Slavery Statement, 2017: 2017.sustainability.wesfarmers.com.au] • Met: Respect H&S of workers: The Company has a publicly available statement for safe and hygienic working environments that are without risk to health. Workers shall receive adequate regular training to perform their jobs in a safe manner. Personal protective equipment and machinery safeguards shall be supplied and workers trained in their use. Where suppliers provide accommodation it shall be clean, safe and meet the basic needs of workers. Workers will have access to clean toilet facilities, clean drinking water and, where appropriate, sanitary facilities for food storage and preparation. Workers have the right to refuse work that is unsafe. [Ethical Sourcing Policy, 2016: wesfarmers.com.au] • Met: H&S applies to AG suppliers: The Company has a publicly available statement in which suppliers need to provide safe and hygienic working environments that are without risk to health, taking into consideration knowledge of the relevant industry and any specific hazards. [Wesfarmers Human Rights and Modern Slavery Statement, 2017: 2017.sustainability.wesfarmers.com.au]
A.1.3.a.AG	Commitment to respect human rights particularly relevant to the industry - land and natural resources (AG)	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: Respect land ownership and resources • Not met: Respecting the right to water • Not met: Expecting suppliers to respect these rights <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Voluntary Guidelines on Tenure • Not met: IFC Performance Standards • Not met: FPIC for all • Not met: Zero tolerance for land grabs • Not met: Respecting the right to water • Not met: Expecting suppliers to respect these rights
A.1.3.b.AG	Commitment to respect human rights particularly relevant to the industry - people's rights (AG)	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: Women's rights: The Company is a signatory to the United Nations Women's Empowerment Principles. [Corporate Governance Statement, 2017: wesfarmers.com.au] • Not met: Children's rights • Not met: Expects suppliers to respect these rights <p>Score 2</p> <ul style="list-style-type: none"> • Not met: CEDAW/Women's Empowerment Principles: The Company is a signatory to the United Nations Women's Empowerment Principles, however there is no reference to the relevant parts of the convention. • Not met: Expecting suppliers to respect these rights
A.1.4	Commitment to engage with stakeholders	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: Commits to stakeholder engagement: The Company engages regularly with stakeholders to understand their expectations. The Company also provides detailed methods of communication for different stakeholder groups including shareholders, customers, employees, suppliers, government and non-government organisations, community and the media. <p>The Company states that they 'regularly engage with our stakeholders to understand their expectations'. [Sustainability Report, 2017: sustainability.wesfarmers.com.au & Stakeholder Engagement, 2015: 2015.sustainability.wesfarmers.com.au]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Commits to engage stakeholders in design • Not met: Regular stakeholder design engagement

Indicator Code	Indicator name	Score (out of 2)	Explanation
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: The Company recognises that it must take steps to identify and address any actual or potential adverse impacts with which it may be involved, both directly and indirectly, through its activities or business relationships. Despite this, there is no policy or commitment to remedy these impacts to which the Company has caused or contributed to. [Wesfarmers Human Rights and Modern Slavery Statement, 2017: 2017.sustainability.wesfarmers.com.au] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Not obstructing access to other remedies • Not met: Collaborating with other remedy initiatives • Not met: Work with AG 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): To reduce the risk of unethical business practises in the supply chain, the Company applies an ethical sourcing audit program to higher risk brand suppliers. This audit includes looking for forced land indicators such as intimidation and threats. [Wesfarmers Human Rights and Modern Slavery Statement, 2017: 2017.sustainability.wesfarmers.com.au] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Expects AG suppliers to reflect company HRD commitments: It is not clear if the Company's audit program and hence policy in regards to intimidation and threats applies to all suppliers. The Company's human rights and modern slavery statement states that the audit program is conducted on higher risk brand suppliers not all suppliers. [Wesfarmers Human Rights and Modern Slavery Statement, 2017: 2017.sustainability.wesfarmers.com.au]

A.2 Policy Commitments (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.2.1	Commitment from the top	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: CEO or Board approves policy: The Company's human rights statement has been signed off by the managing director and director. Furthermore, the company's ethical sourcing policy and human rights issues are overseen through regular reporting to the Company's Audit and Risk Committee, a committee of the Company's board. [Wesfarmers Human Rights and Modern Slavery Statement, 2017: 2017.sustainability.wesfarmers.com.au & Sustainability Report, 2017: sustainability.wesfarmers.com.au] • Met: Board level responsibility for HRs: The Company's human rights statement has been signed off by the managing director and director. Furthermore the company's ethical sourcing policy and human rights issues are overseen through regular reporting to the Company's Audit and Risk Committee, a committee of the Company's board. [Sustainability Report, 2017: sustainability.wesfarmers.com.au & Wesfarmers Human Rights and Modern Slavery Statement, 2017: 2017.sustainability.wesfarmers.com.au] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Speeches/letters by Board members or CEO: Richard Goyder has a managing directors welcome video as part of the 2017 sustainability reporting suite. Goyder speaks about how they audited more than 5000 factories in their businesses under ethical sourcing. However, there is no mentioned to the company's HR approach. [Managing Director's welcome, 14/08/2018: sustainability.wesfarmers.com.au]
A.2.2	Board discussions	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: Board/Committee review of salient HRs: The Company states that each business unit has its own process and triggers for identifying human rights issues and impacts with its suppliers. Some business use platforms such as the Supplier Ethical Data Exchange (SEDEX) to streamline ethical and human rights compliance and monitoring. The businesses also conduct audits and use risk tools to understand potential human rights violations in their supply chains where appropriate. However, there is no information to suggest that these issues are reviewed at board level or by a board committee regularly. <p>The Company also discloses that ethical sourcing and human rights issues are overseen through regular reporting to the Wesfarmers Audit and Risk Committee, a committee of the Wesfarmers Board. [Sustainability Report, 2017:</p>

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			<p>sustainability.wesfarmers.com.au & Wesfarmers Human Rights and Modern Slavery Statement, 2017: 2017.sustainability.wesfarmers.com.au]</p> <ul style="list-style-type: none"> • Not met: Examples or trends re HR discussion: The Company does disclose that ethical sourcing and human rights issues are reported to the Wesfarmers Audit and Risk Committee. However, the Company does not disclose specific examples of what the Company board has discussed at past board meetings. [Wesfarmers Human Rights and Modern Slavery Statement, 2017: 2017.sustainability.wesfarmers.com.au] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both examples and process
A.2.3	Incentives and performance management	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Incentives for at least one board member • Not met: At least one key AG HR risk, beyond employee H&S <p>Score 2</p> <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	1.5	<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: Senior responsibility fo HR (inc ILO): The Company's Sustainability Report governance section states that senior management in each business are responsible for managing human rights issues with their suppliers. It also states that each business has its own process and triggers for identifying human rights risks and impacts. This includes the ILO core labour standards as each business unit/division is contractually required to take all the reasonable steps to comply with the minimum standards which include no forced labour, no child labour, no discrimination and freedom of association amongst other standards. [Sustainability Report, 2017: sustainability.wesfarmers.com.au] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Day-to-day responsibility: The Company discloses 'All sustainability issues at Wesfarmers, including human rights, are managed at a divisional level by senior management. Each division has strategic teams which identify and manage sustainability issues relevant for their business including modern slavery and human rights risks. Senior management in each business is responsible for managing human rights issues with their suppliers. Each business has its own process and triggers for identifying human rights risks and impacts.' [Wesfarmers Human Rights and Modern Slavery Statement, 2017: 2017.sustainability.wesfarmers.com.au] • Not met: Day-to-day responsibility in supply chain
B.1.2	Incentives and performance management	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Senior manager incentives for human rights • Not met: At least one key AG HR risk, beyond employee H&S <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Performance criteria made public
B.1.3	Integration with enterprise risk management	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: HR part of enterprise risk system: The Company recognises ethical sourcing and human rights as operational risks to their business. To mitigate these risks the Company applies a human rights and ethical sourcing audit program to certain suppliers. In 2017 the audit covered 5,455 suppliers and factories in both Australia and overseas. [Annual Report, 2017: wesfarmers.com.au & Sustainability Report, 2017: sustainability.wesfarmers.com.au] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Audit Ctte or independent risk assessment
B.1.4.a	Communication /dissemination of policy commitment(s) within Company's own operations	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: Communicates its policy to all workers in own operations <p>Score 2</p> <ul style="list-style-type: none"> • Met: Communication of policy commitments to stakeholder: The Company's policy on human rights is communicated to suppliers via the terms of reference agreement. Suppliers must agree to act transparently, to remedy any issues and to drive continuous improvement. The terms of reference includes compliance with

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>the Company minimum standards which include all 4 core labour standards. [Wesfarmers Human Rights and Modern Slavery Statement, 2017: 2017.sustainability.wesfarmers.com.au]</p> <ul style="list-style-type: none"> • 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	<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: Steps to communicate policy commitments to BRs: The Company communicates its Ethical Sourcing and human rights policies to suppliers and business relationships via terms of reference agreement. [Wesfarmers Human Rights and Modern Slavery Statement, 2017: 2017.sustainability.wesfarmers.com.au] • Not met: Including to AG suppliers: The Company states 'The Ethical Sourcing Policy applies to all Coles Brand product, fresh produce and meat. Our suppliers agree to meet our policy and standards as part of their contract terms and conditions. If a supplier cannot demonstrate a commitment to our Ethical Sourcing Policy, we reserve the right to terminate its trading agreement.' However, it is not clear how the company cascades it's human rights policy commitments down its supply chain, or requires its suppliers to do so. [Ethical Sourcing, 14/08/2018: coles.com.au] <p>Score 2</p> <ul style="list-style-type: none"> • Met: How HR commitments made binding/contractual: The Company's Ethical Sourcing Policy which includes elements of the Company's human rights policies (for example details on the minimum labour standards) are contractual. [Ethical Sourcing Policy, 2016: wesfarmers.com.au] • Not met: Including on AG suppliers: Although the Company ensures suppliers comply with the ethical sourcing policy, it is not clear whether the company requires the supplier to cascade the contractual or other binding requirements down their supply chain.
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"> • Not met: Trains all workers on HR policy commitments: The Company trains relevant employees (buying and sourcing teams) on how to incorporate respect for human rights into all business decisions and making employees aware of the impact their actions can have on human rights. Not all employees of all business units receive this training. [Wesfarmers Human Rights and Modern Slavery Statement, 2017: 2017.sustainability.wesfarmers.com.au] • Met: Trains relevant managers including procurement: The Company keeps its buying and sourcing teams up to date on the Company's ethical sourcing and human rights commitments and how their actions may impact workers rights. For example, the Company trains purchasing team members on the implications of short-notice purchase decisions on potential human rights risks. [Wesfarmers Human Rights and Modern Slavery Statement, 2017: 2017.sustainability.wesfarmers.com.au] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met
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"> • Not met: Monitoring implementation of HR policy commitments: The Company uses the Supplier Ethical Data Exchange (SEDEX) to streamline ethical and human rights compliance and monitoring. It also conducts audits and uses risk tools to understand potential human rights violations in the supply chain where appropriate. The Company's human rights policy includes the core labour standards. However, there is no information to suggest that the Company monitors the implementation of human rights policies in its own operations. [Wesfarmers Human Rights and Modern Slavery Statement, 2017: 2017.sustainability.wesfarmers.com.au] • Met: Monitoring AG suppliers: The Company's audit and risk committee conduct supplier audits. The company also uses the Supplier Data Exchange (SEDEX) to monitor human rights compliance of its suppliers. [Wesfarmers Human Rights and Modern Slavery Statement, 2017: 2017.sustainability.wesfarmers.com.au] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Describes corrective action process: The Company identified 81 critical breaches across 66 factories in its audit program. Critical breaches involved concerned or suspected human rights issues of attempted bribery, forced labour, unauthorised sub-contracting and child labour. 44 of these issues were remedied, 8 were resolved with action plans and the remaining 29 resulted in ceased supply orders. [Wesfarmers Human Rights and Modern Slavery Statement, 2017: 2017.sustainability.wesfarmers.com.au]

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			<ul style="list-style-type: none"> • Not met: Example of corrective action • Not met: Discloses % of supply chain monitored
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 • Met: HR affects on-going supplier relationships: The Company states that if a supplier site is not willing or able to address a critical breach, it will stop buying from that supplier site. [Sustainability Report, 2017: sustainability.wesfarmers.com.au] <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
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 • Not met: Frequency and triggers for engagement: The Company states that each business has its own processes and triggers for identifying human rights risks and impacts. The frequency and specific issue triggers for engagement are not specified. [Wesfarmers Human Rights and Modern Slavery Statement, 2017: 2017.sustainability.wesfarmers.com.au] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Workers in SC 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	1.5	<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: Identifying risks in own operations: The Company's Human Rights statement says each business of Wesfarmers has its own process and triggers for identifying human rights risks and impacts. Some business use the Supplier Ethical Data Exchange (SEDEX) system others rely on business audits. [Wesfarmers Human Rights and Modern Slavery Statement, 2017: 2017.sustainability.wesfarmers.com.au] • Met: Identifying risks in AG suppliers: The Company conducts audits and uses risk tools to understand potential human rights violations in their supply chain in their supply chain. [Wesfarmers Human Rights and Modern Slavery Statement, 2017: 2017.sustainability.wesfarmers.com.au] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Ongoing global risk identification: The Company states 'All sustainability issues at Wesfarmers, including human rights, are managed at a divisional level by senior management. Each division has strategic teams which identify and manage sustainability issues relevant for their business including modern slavery and human rights risks. Senior management in each business is responsible for managing human rights issues with their suppliers. Each business has its own process and triggers for identifying human rights risks and impacts... The businesses also conduct audits and use risk tools to understand potential human rights violations in their supply chains where appropriate.' [Wesfarmers Human Rights and Modern Slavery Statement, 2017: 2017.sustainability.wesfarmers.com.au] • Met: In consultation with stakeholders: The Company's businesses use a number of tools and processes to better understand and manage human rights risks. This includes Integrating responses to our due diligence into our internal systems, acting on the findings, tracking our actions, and communicating with our stakeholders about how we address impacts. [Wesfarmers Human Rights and Modern Slavery Statement, 2017: 2017.sustainability.wesfarmers.com.au] • Not met: In consultation with HR experts • Not met: Triggered by new circumstances • Not met: Explains use of HRIAs or ESIA (inc HR)
B.2.2	Assessing: Assessment of risks and impacts identified (salient risks and key industry risks)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Salient risk assessment (and context) • Not met: Public disclosure of salient risks <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met

Indicator Code	Indicator name	Score (out of 2)	Explanation
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"> • Not met: Action Plans to mitigate risks • Not met: Example of Actions decided • Not met: Including in AG supply chain Score 2 <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	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: System to check if Actions are effective: The Company uses a number of tools and processes to better understand and manage human rights risks. Some of these tools include country risk ratings to better understand local human rights contexts as well as exposure to related issues. As well as integrating responses to due diligence into its internal systems, acting on findings, tracking actions and communicating with stakeholders on how the Company addresses these impacts. For example, one of the Company's businesses, Kmart, trialled a wage monitoring system for suppliers in Bangladesh to improve transparency and enable tracking of wage movements over time. [Wesfarmers Human Rights and Modern Slavery Statement, 2017: 2017.sustainability.wesfarmers.com.au & Sustainability Report, 2017: sustainability.wesfarmers.com.au] • Not met: Lessons learnt from checking effectiveness Score 2 <ul style="list-style-type: none"> • Not met: Both requirement under score 1 met
B.2.5	Communicating : Accounting for how human rights impacts are addressed	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Comms plan re identifying risks: The Company has communicated through its Human rights and modern slavery statement how it has a system to identify human rights risks and impacts including own operations and supply chain (see b.2.1) [Wesfarmers Human Rights and Modern Slavery Statement, 2017: 2017.sustainability.wesfarmers.com.au] • 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 AG 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 Company's whistle-blower policy outlines a number of channels in which workers can report issues. Employees can raise matters with their immediate supervisor, manager or other senior supervisor. Employees may also make reports via the Wesfarmers Fair Call service which is a free external hotline service independently monitored by KPMG. The Company's Sustainability Report states that grievance mechanisms are accessible by employee and external community stakeholders. The company has also established grievance mechanisms for workers in its supply chain. [Whistle-blower Policy, 2015: wesfarmers.com.au] Score 2 <ul style="list-style-type: none"> • Not met: Number grievances filed, addressed or resolved • Met: Channel is available in all appropriate languages: Coles has a Wages and Conditions Hotline for Farm and Factory Workers used for the reporting of unfair labour practices. For workers who do not speak English as their first language there is an email facility. The Company states ' Workers can provide their telephone number, preferred language and a brief description of their concerns.' The Company has clarified to the CHRB that the hotline poster detailing the details of the hotline in four different languages. [Wesfarmers Human Rights and Modern Slavery Statement, 2017: 2017.sustainability.wesfarmers.com.au] • Not met: Expect AG supplier to have equivalent grievance systems • Not met: Opens own system to AG supplier workers

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.2	Grievance channel(s)/mechanism(s) to receive complaints or concerns from external individuals and communities	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: Grievance mechanism for community: The Company's Modern Slavery Statement states that 'we also promote the provision of effective grievance mechanisms by our suppliers.' The Company's Sustainability Report states that grievance mechanisms 'are accessible by our employees and external community and stakeholders'. [Sustainability Report, 2017: sustainability.wesfarmers.com.au & Wesfarmers Human Rights and Modern Slavery Statement, 2017: 2017.sustainability.wesfarmers.com.au] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Describes accessibility and local languages: Coles has a Wages and Conditions Hotline for Farm and Factory Workers used for the reporting of unfair labour practices. For workers who do not speak English as their first language there is an email facility. The Company has disclosed that the poster advertising the Hotline is available in the most common four languages spoken by workers in their supply chain. While this hotline is available for factory and farm workers it does not extend to all external communities and stakeholders. [Wesfarmers Human Rights and Modern Slavery Statement, 2017: 2017.sustainability.wesfarmers.com.au] • Not met: Expects AG supplier to have community grievance systems: The Company promotes the provision and implementation of effective grievance mechanisms by its suppliers. However, there is no information to suggest that this is an expectation. [Wesfarmers Human Rights and Modern Slavery Statement, 2017: 2017.sustainability.wesfarmers.com.au] • Not met: AG supplier communities use global system
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"> • Not met: Engages users to create or assess system • Not met: Description of how they do this <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Engages with users on system performance • Not met: Provides user engagement example on performance • Not met: AG suppliers consult users in creation or assessment
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"> • Not met: Response timescales: After a matter is raised with a supervisor, manager or another senior supervisor that supervisor must take the matter to a Protected Disclosure Offices or senior executive within the division or business unit. Alternatively, reports can be made via the Company's Fair Call Service which is independently monitored by KPMG. These reports will be passed back to an appropriate Protected Disclosure Officer. [Whistle-blower Policy, 2015: wesfarmers.com.au] • Not met: How complainants will be informed: The Company will investigate all reported matters. A Protected Disclosure Officer may, with the whistle-blower's consent, appoint a person to assist in the investigation of a matter raised in a report. The Company states 'Where appropriate, the Company will provide feedback to the whistle-blower regarding the investigation's progress and the outcome'. There is no information to describe how whistle-blower will receive this feedback. [Whistle-blower Policy, 2015: wesfarmers.com.au] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Escalation to senior/independent level
C.5	Commitment to non-retaliation over complaints or concerns made	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: Public statement prohibiting retaliation • Not met: Practical measures to prevent retaliation: The Company's whistleblower policy states that a report may be submitted anonymously if the person making the complaint does not wish to disclose their identity to the Protected Disclosure Officer or FairCall hotline. There are no further details on how this can be executed and how it prevents retaliation. The Company also states 'A Wesfarmers employee or contractor within a Wesfarmers team who is subjected to detrimental treatment as a result of making a report in good faith under this policy should inform a senior supervisor within their division/business unit immediately.' [Whistle-blower Policy, 2015: wesfarmers.com.au] <p>Score 2</p> <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-	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: Won't impede state based mechanisms

Indicator Code	Indicator name	Score (out of 2)	Explanation
	based judicial and non-judicial grievance mechanisms		<ul style="list-style-type: none"> • Not met: Complainants not asked to waive rights 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: The company states that it provided remediation of several contaminated sites that were owned by former Wesfarmers businesses and that remediation was implemented in three factorises following breaches in relation to bribery (10 cases), forced labour (1 case), child labour (1 case) and unauthorised subcontracting (1 case). However, there is no specific information to describe how this remediation was provided to victims. The Company details how they deal with supplier non-conformances, however, this is different to how they provide remedy to community members, employees, etc who have been affected by the Company's operations. [Sustainability Report, 2017: sustainability.wesfarmers.com.au] <ul style="list-style-type: none"> • Not met: Says how it would remedy key sector risks Score 2 <ul style="list-style-type: none"> • Not met: Changes introduced to stop repetition • Not met: Approach to learning from incident to prevent future impacts • Not met: Evaluation of the channel/mechanism

D. Performance: Company Human Rights Practices (20% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.1.1.a	Living wage (in own agricultural operations)	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 target timeframe • Not met: Describes how living wage determined: The Company states that it pays at least the minimum wage in all locations in Australia as required by law. Although two of the Company's business units, Target and Kmart, participate in the Action Collaboration Transformation Living Wage collaboration there is no description on how the living wage is determined and if is applied to all employees. [Sustainability Report, 2017: sustainability.wesfarmers.com.au] Score 2 <ul style="list-style-type: none"> • Not met: Paying living wage • Not met: Definition of living wage reviewed with unions
D.1.1.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: The Company Ethical Sourcing Policy states that suppliers must comply at a minimum with all laws regulating local wages. There is no reference to living wages. The Company discloses that Kmart joined 'Action, Collaboration, Transformation' (ACT), a collaboration between international brands and retailers manufacturers and trade unions to address the issue of living wages in the garment and textile industry. However, although the Company's Kmart business has joined ACT there is no evidence that this has translated to living wage requirements being in Company-wide supplier codes or contracts. [Ethical Sourcing Policy, 2016: wesfarmers.com.au] <ul style="list-style-type: none"> • 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: Provides analysis of trends in progress made
D.1.2	Aligning purchasing decisions with human rights	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Avoids business model pressure on HRs (purchasing practices) • Not met: Positive incentives to respect human rights (purchasing practices): All suppliers are required to agree to the principles outlined in the Coles Ethical Sourcing Policy as outlined in their Trading Agreement with Coles. This covers requirements relating to forced/bonded labour, child labour, illegal labour, harsh or inhumane treatment, wages and benefits, working hours, freedom of association, and safe working conditions. If suppliers are unable to demonstrate a commitment to comply with the Coles Ethical Sourcing Policy, Coles reserves the right to terminate the Trading Agreement.

Indicator Code	Indicator name	Score (out of 2)	Explanation
			Supply to Coles can only commence once the Supplier is Approved under the Ethical Sourcing Policy. [Ethical Sourcing: Supplier Requirements, 01/03/2016: coles.com.au] Score 2 • Not met: Both requirements under score 1 met
D.1.3	Mapping and disclosing the supply chain	0	The individual elements of the assessment are met or not as follows: Score 1 • Not met: Identifies suppliers back to manufacturing sites (factories or fields): The Company states that it is working to map suppliers beyond tier one to include tier two and tier three suppliers (suppliers producing components which go into a final product e.g. cotton suppliers). Although the Company is working on this, it is not clear if mapping includes agricultural suppliers mapping of farms. [Sustainability Report, 2017: sustainability.wesfarmers.com.au] Score 2 • Not met: Discloses significant parts of SP and why: The Company discloses apparel suppliers locations in China. However, the Company does not disclose information regarding agricultural suppliers. [Coles Apparel Suppliers, 15/08/2018: coles.com.au]
D.1.4.a	Child labour: Age verification and corrective actions (in own agricultural operations)	1	The individual elements of the assessment are met or not as follows: Score 1 • Met: Does not use child labour: The Company's Code of Conduct and Ethical Sourcing Policy detail prohibition of discrimination as well as forced, trafficked and child labour. [Sustainability Report, 2017: sustainability.wesfarmers.com.au] • Met: Age verification of applicants and workers: The Company's Ethical Sourcing Policy states that suppliers must be able to verify the age of all employees to ensure compliance with the International Labour Organisation Convention 138 as well as the minimum legal working age in the country of operation. [Ethical Sourcing Policy, 2016: wesfarmers.com.au] Score 2 • Not met: Remediation if children identified: The Company's Ethical Sourcing Policy states that suppliers must accept the principles of remediation of child and under age workers and where such labour is discovered establish and implement appropriate remediation and systems to prevent if from occurring again in the future. However, the Company does not describe any details of the remediation it provides. [Ethical Sourcing Policy, 2016: wesfarmers.com.au]
D.1.4.b	Child labour: Age verification and corrective actions (in the supply chain)	1	The individual elements of the assessment are met or not as follows: Score 1 • Met: Child Labour rules in codes or contracts: The Company's Ethical Sourcing Policy states that 'suppliers must be able to verify the age of all employees to ensure compliance. Suppliers must accept the principles of remediation of child and under age workers, and where such labour is discovered suppliers must establish and implement appropriate remediation for such workers and introduce effective systems to prevent the use of child labour in the future'. The Company also states that it does not work suppliers who do not abide by their Ethical Sourcing Policy and hence policies in regards to child labour. [Ethical Sourcing Policy, 2016: wesfarmers.com.au] • Not met: How working with suppliers on child labour: The Company has a auditing process for suppliers, and the assessments cover child labour. However, this does not clarify how the Company works with suppliers to eliminate child labour and to improve working conditions for young workers. [Ethical Sourcing: Supplier Requirements, 01/03/2016: coles.com.au] Score 2 • Not met: Both requirements under score 1 met • Not met: Analysis of trends in progress made
D.1.5.a	Forced labour: Debt bondage and other unacceptable financial costs (in own agricultural operations)	0	The individual elements of the assessment are met or not as follows: Score 1 • Not met: Pays workers in full and on time • Not met: Payslips show any legitimate deductions Score 2 • Not met: How these practices are implemented and monitored for agencies, labour brokers or recruiters

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.1.5.b	Forced labour: Debt bondage and other unacceptable financial costs (in the supply chain)	1.5	<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: Debt and fees rules in codes or contracts: The Company's Sustainability Report states that forced labour such as debt bondage and withholding wages are considered in the ethical sourcing audit program. The Company also states that it will only engage with suppliers who follow their ethical sourcing policy. [Sustainability Report, 2017: sustainability.wesfarmers.com.au] • Met: How working with suppliers on debt & fees: The Company has an auditing process for suppliers, and the assessments cover 'workers must not be required to lodge deposits', 'Deductions from wages may only occur with the express written permission of the worker concerned' and 'Deductions from wages for disciplinary measures are not permitted'. This does not cover fees for recruitment or withholding wages. Moreover, although the Company auditing process can result in the termination of supplier contracts, the Company does not clarify how they work with suppliers to eliminate child labour and to improve working conditions for young workers. <p>The Company has committed to the Pledge Against Forced Labour, Retail & Supplier Roundtable. In signing the pledge the Company commits to working together with stakeholders (including suppliers) to eradicate forced labour from their supply chain. [Ethical Sourcing: Supplier Requirements, 01/03/2016: coles.com.au & Retail and Supplier Roundtable: Pledge Against Forced Labour, 15/08/2018: retailsupplierroundtable.org.au]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Met: Both requirements under score 1 met: As above [Ethical Sourcing: Supplier Requirements, 01/03/2016: coles.com.au] • Not met: Analysis of trends in progress made
D.1.5.c	Forced labour: Restrictions on workers (in own agricultural operations)	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: Does not retain documents or restrict movement: The Company's Human Rights statement includes indicators such as restriction of movement and retention of identity documents as factors in its ethical audit approved under the company's supplier audit program. Wesfarmers have made it clear that they will only select suppliers who abide by their ethical sourcing policy. [Wesfarmers Human Rights and Modern Slavery Statement, 2017: 2017.sustainability.wesfarmers.com.au & Ethical Sourcing Policy, 2016: wesfarmers.com.au] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: How these practices are monitored for agencies, labour brokers or recruiters
D.1.5.d	Forced labour: Restrictions on workers (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: Free movement rules in codes or contracts: The Company's Human Rights statement indicates that the Company's Ethical Sourcing audit program ensures high-risk suppliers do not retain identity documents or restrict the movement of workers. These policies are communicated to suppliers via the terms of reference. The Company Ethical Sourcing Supplier Requirements covers 'Workers must not be required to lodge deposits or identity papers with suppliers.' and 'Workers must be free to leave their employment after reasonable notice, not more than 1 month, has been given.' [Wesfarmers Human Rights and Modern Slavery Statement, 2017: 2017.sustainability.wesfarmers.com.au & Ethical Sourcing: Supplier Requirements, 01/03/2016: coles.com.au] • Not met: How working with suppliers on free movement: Although there are references to free movement in the supplier requirements that are audited and can result in the termination of contracts, it is not clear how the Company positively works with suppliers on issues relating to free movement. [Ethical Sourcing: Supplier Requirements, 01/03/2016: coles.com.au] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met • Not met: Analysis of trends in progress made

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.1.6.a	Freedom of association and collective bargaining (in own agricultural operation)	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: Commits not to interfere with union rights / Steps to avoid intimidation or retaliation: The Company's Modern Slavery statement 'recognises the right of those we employ to negotiate either individually or collectively, with or without the involvement of third parties. Collective agreements typically include provisions for notice periods and the provisions for consultation and negotiation'. The company also believes in 'maximising the flexibility of workplace arrangements available to our employees and their managers.' The Company ethical audit also considers forced labour indicators such as intimidation and threats. [Wesfarmers Human Rights and Modern Slavery Statement, 2017: 2017.sustainability.wesfarmers.com.au] • Met: Discloses % covered by collective bargaining agreements: The Company states that more than 83 percent of their workforce is covered by collective agreements. [Sustainability Report, 2017: sustainability.wesfarmers.com.au] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Both requirements under score 1 met
D.1.6.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"> • Met: FoA & CB rules in codes or contracts: The Company's Ethical Sourcing Policy - Freedom of Association section states 'suppliers should not interfere with, obstruct or prevent legitimate related activities, such as collective bargaining'. <p>The Ethical Sourcing Policy also states that each division/business unit must adopt policies and procedures to ensure that suppliers engaged by the division/business unit to supply goods for resale through its retail network, not matter where they are located and operate within the world' and are: iii) encouraged to exceed the minimum standards, and promote best practice and continuous improvement.</p> <p>The Company's Ethical Sourcing Supplier Requirements sets out the right to freedom of association and to bargain collectively. [Ethical Sourcing Policy, 2016: wesfarmers.com.au]</p> <ul style="list-style-type: none"> • Not met: How working with suppliers on FoA and CB: The Company has an auditing process for suppliers, and the assessments cover 'Suppliers acknowledge that workers have a right to freedom of association and to bargain collectively', 'Workers have a right to join or form trade unions of their choosing. Suppliers are required to adopt an open attitude towards the activities of trade unions and their organisation activities' and 'Where the right to freedom of association and collective bargaining are restricted under local laws, suppliers will not hinder the development of alternative means of independent and free association and bargaining'. Although the Company auditing process can result in the termination of supplier contracts, the Company does not clarify how they work with suppliers to improve their practices of freedom of association and collective bargaining. [Ethical Sourcing: Supplier Requirements, 01/03/2016: coles.com.au] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met • Not met: Provides analysis of trends in progress made
D.1.7.a	Health and safety: Fatalities, lost days, injury rates (in own agricultural operations)	1.5	<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: Injury Rate disclosures: To monitor historical safety performance the Company uses total recordable injury frequency rate (TRIFR) which dropped by 16 per cent in 2017. [Sustainability Report, 2017: sustainability.wesfarmers.com.au] • Met: Lost days or near miss disclosures: To monitor historical safety performance the Company uses lost time injury frequency rate (LTIFR) which show injuries per million hours worked by employees and long-term contractors. In 2017, the LTIFR increased by 1.4 per cent. [Sustainability Report, 2017: sustainability.wesfarmers.com.au] • Met: Fatalities disclosures: The Company recorded one fatality during 2017 where a women was involved in a car accident on her way to work. Under the journey provisions Act this accident resulted in a workers compensation claims because it happened during a journey between the team members home and work. [Sustainability Report, 2017: sustainability.wesfarmers.com.au]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> • Met: Set targets for H&S performance: The Company states that it delivered excellent outcomes in employee health and safety during the year with all business units achieving target reductions in total recordable injury frequency rate. In 2017-18 the Company targets include reducing Lost time injury frequency rate (LTIFR) less than one, reducing total recordable injury frequency rate (TRIFR) by 10. and reducing high potential incidents by 25 per cent. [Health and Safety, 2017: sustainability.wesfarmers.com.au & Sustainability Report, 2017: sustainability.wesfarmers.com.au] • Not met: Met targets or explains why not: The Company was able to reduce the total recordable injury frequency rate (TRIFR) by 16 per cent however the lost time injury frequency rate (LTIFR) increased by 1.4 per cent which means it has not met the less than 1 per cent target. There is information on the potential incident performance. [Health and Safety, 2017: sustainability.wesfarmers.com.au & Sustainability Report, 2017: sustainability.wesfarmers.com.au]
D.1.7.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 Company states 'Keeping our employees, customers, suppliers and visitors across all our sites safe is our highest priority.' in their sustainability report. The Company's ethical sourcing policy states ;Suppliers shall provide a safe and hygienic working environment that is without risk to health, taking into consideration knowledge of the relevant industry and any specific hazards. Workers shall receive adequate and regular training to perform their jobs in a safe manner. Personal protective equipment and machinery safeguards shall be supplied and workers trained in their use. Where suppliers provide accommodation it shall be clean, safe and meet the basic needs of workers. Workers will have access to clean toilet facilities, clean drinking water and, where appropriate, sanitary facilities for food storage and reparation. Workers have the right to refuse work that is unsafe.' [Sustainability Report, 2017: sustainability.wesfarmers.com.au] • Not met: Injury Rate disclosures • Not met: Lost days or near miss disclosures • Not met: Fatalities disclosure <p>Score 2</p> <ul style="list-style-type: none"> • Not met: How working with suppliers on H&S: The Company has an auditing process for suppliers, and the assessments covers criteria relating to safe working conditions such as 'Workers must receive adequate, recorded training to perform their jobs in a safe manner.' Although the Company auditing process can result in the termination of supplier contracts, the Company does not clarify how they work with suppliers to improve their health and safety practices. [Ethical Sourcing: Supplier Requirements, 01/03/2016: coles.com.au] • Not met: Provide analysis of trends in progress made
D.1.8.a	Land rights: Land acquisition (in own agricultural operations)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Approach to identification of land tenure rights holders • Not met: Approach to doing so if no recent land deals <p>Score 2</p> <ul style="list-style-type: none"> • Not met: How valuation and compensation works • Not met: Steps to meet IFC PS 5 in state deals • Not met: Describes approach if no recent land deals
D.1.8.b	Land rights: Land acquisition (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: Rules on land & owners in codes or contracts • Not met: How working with suppliers on land issues <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met • Not met: Provides analysis of trends in the progress made
D.1.9.a	Water and sanitation (in own agricultural operations)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Action to prevent water and sanitation risks <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Water targets considering local factors • Not met: Reports progress and shows trends in progress made

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.1.9.b	Water and sanitation (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: Rules on water stewardship in codes or contracts: The Company discloses in the Ethical Sourcing Supplier Requirements 'Workers must have access to clean toilet facilities, clean drinking water and where appropriate sanitary facilities for food storage and preparation.' However, this does not include a requirement to refrain from negatively affecting access to safe water. [Ethical Sourcing: Supplier Requirements, 01/03/2016: coles.com.au] Not met: How working with suppliers on water stewardship issues 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
D.1.10.a	Women's rights (in own agricultural operations)	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: Process to stop harassment and violence against women Not met: Working conditions take account of gender Met: Equality of opportunity at all levels of employment: The Company's commitment to diversity extends to all individuals and all perspectives. Particular focus is paid to achieving a balance of men and women in senior management positions across our divisions. [Corporate Governance Statement, 2017: wesfarmers.com.au] Score 2 <ul style="list-style-type: none"> Not met: Meet all requirements under score 1
D.1.10.b	Women's rights (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: Women's rights in codes or contracts Not met: How working with suppliers on women's rights 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		No allegations meeting the CHRB severity thresholds were found, and so the score of 22.10 out of 80 points scored in themes A-D & F has been applied to produce a score of 5.53 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	2.2 out of 4	Out of a total of 51 indicators assessed under sections A-D of the benchmark, Wesfarmers made data public that met one or more elements of the methodology in 28 cases, leading to a disclosure score of 2.2 out of 4 points.
F.2	Recognised Reporting Initiatives	2 out of 2	The individual elements of the assessment are met or not as follows: Score 2 <ul style="list-style-type: none"> Met: Company reports on GRI: The Company's 2017 Sustainability Report was prepared in accordance with the Global Reporting Initiatives Standards and assured by Ernst & Young. [Sustainability Report, 2017: sustainability.wesfarmers.com.au]
F.3	Key, High Quality Disclosures	0 out of 4	Wesfarmers met 0 of the 10 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"> 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 <ul style="list-style-type: none"> 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 Demonstrating a forward focus

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 • Not met: Score 1 for D.1.1.a : Living wage (in own agricultural operations) • Not met: Score 2 for D.1.7.a : Health and safety: Fatalities, lost days, injury rates (in own agricultural operations)

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.