

CHRB



Corporate Human
Rights Benchmark

**REPORT
ON THE
2018
APPEALS
PROCESS**

**CORPORATE HUMAN
RIGHTS BENCHMARK**

March 2019

A. INTRODUCTION

In November 2018, the Corporate Human Rights Benchmark (CHRB) launched the second Corporate Human Rights Benchmark for 101 companies in the agricultural products, apparel and extractives sectors. CHRB has had a “appeals process” from the very first benchmarking exercise (see below), but this was the first year that the process was used. CHRB is taking the opportunity of this first exercise to set out CHRB’s approach to the appeals process, the outcomes and implications for scoring, our key learnings and also sets out some key points for benchmarked companies to learn for the 2019 round of benchmarking.

CHRB would like to thank the companies for taking part and particularly Margaret Wachenfeld, Lise Smit and Nadia Bernaz for their role in the Appeals Panel process.

B. REASON FOR AN APPEALS PROCESS

CHRB is about transparency and continuous improvement – for the companies involved but also for ourselves. We also have a strong commitment to good governance and accountability and seek to model that behaviour for ourselves. We recognise that despite our best efforts, company evidence can be missed and there can be differences in interpretation of data. CHRB therefore has an appeals process that allows CHRB to engage with companies, apply a critical eye to the research process and correct any errors. It also allows CHRB to identify where there is confusion regarding the methodology wording and to help provide feedback to all companies for the next research cycle.

C. THE STEPS IN THE PROCESS

As this was the first time CHRB has run the appeals process, there were inevitably additional new steps and issues to be addressed that resulted in some delays in getting the final scores to appealing companies. However, we feel the time has been well spent in adopting a rigorous multi-level review. The key stages to the process are outlined below:

- Launch of benchmark results on 12th November 2018
- Six week window to submit appeals using a standardised [template](#), downloadable from the CHRB [website](#).
- Internal review – CHRB staff reviewed each indicator. The initial review assessed any new evidence sources, checked whether they were identified in the research process originally and if they were published within the cut-off deadlines. A further review filtered out any ‘technical fails’, for example where a company was appealing for half-points on an indicator that is not scored with half-points. Once complete, CHRB staff then assessed the evidence provided and arrived at an initial ‘approve, reject, further review’ position.
- Research team review¹ – The appeals and CHRB initial recommendations were passed to the research team who were given a right to reply. Following their own review, there was significant discussion between the two teams as to an agreed final position.

¹ CHRB contracted the EIRIS Foundation to deliver the majority of the research outputs in 2018

- Initial Approval – Where both CHRB staff and the research team agreed that extra points should be awarded, this decision was communicated to the companies involved.
- Initial Rejection / Referral – Where both CHRB staff and the research team agreed an appeal should be rejected, or where it was partially accepted, it was passed to the appeals panel². This was a change from the original plan (where all appeals would go to the panel if there were a potential score change of more than 2% per company) as we received more appeals than expected and given limited resources, had to focus the panel’s attention on reviewing those appeals that were recommended for rejection. This change is a lesson learned and will be reflected in the revised appeals process for 2019.
- The three members of the panel independently reviewed each individual appeal (i.e. each appeal is about one, individual indicator), along with the comments from the company and the recommendation from CHRB, that reflected the discussions with the research team. Where there was consensus, the appeal decision was finalised. Where there were questions or a lack of consensus, discussions were had to reach a majority decision.
- CHRB staff collated the final decisions and informed the companies, along with the details, as to whether their appeals were successful, along with any changes to their scoring.
- The CHRB website is in the process of being updated for changes to scores, ranking and downloadable data sets.

The number of appeals, the amount of secondary research, the time for interaction between members of the process, the Christmas break and the finalisation of the decisions meant that it took a month longer than expected to produce this finalised report. We think the process is robust and unique to benchmarking/rating processes but welcome any and all comments.

D. OVERVIEW OF APPEALS

1. Companies Involved

CHRB received over 50 individual appeals from 7 companies. This was a much larger figure than anticipated³. Successful appeals were received from the following companies:

- Anheuser-Busch InBev
- Chevron Corporation
- Glencore
- Goldcorp
- Heineken NV
- Target

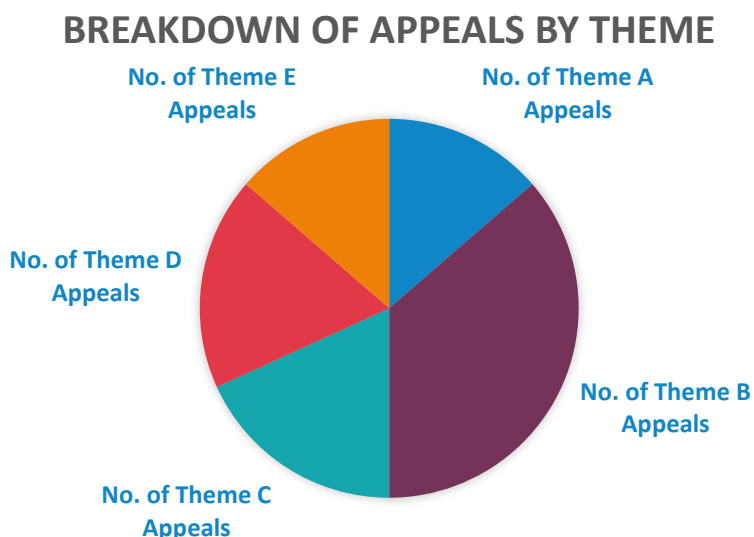
Apart from Target, no companies in the bottom half of the benchmark appealed their scores. Additionally, no companies in the top 20 ranking appealed their scores.

² The Appeals Panel was led by Margaret Wachenfeld, Themis Research, who is a co-chair of the CHRB Methodology Committee and a member of the CHRB Advisory Council but who was not directly involved with any of the primary research on companies for the CHRB. The other two independent members of the Appeals Panel to whom CHRB owes a great debt for their willingness and diligence in supporting the CHRB Appeals Process on a pro bono basis, were Lise Smit, Senior Research Fellow in Business and Human Rights at the British Institute of International & Comparative Law, and Dr Nadia Bernaz, Associate Professor at Wageningen University, the Netherlands.

³ CHRB received no appeals following the 2017 Results launch

2. Themes and Indicators Appealed

Almost half of the appeals concerned scores related to Theme B (embedding respect for human rights and due diligence), a quarter of appeals related to Theme A (governance and policies), while the remaining were split between the other themes.



The two most common appeals were for the following indicators:

A.1.1 – Commitment to Respect Human Rights Appeals generally aimed at increasing scores from a 1 to a 2, implying a commitment to the UNGPs or the OECD Guidelines. No A.1.1 appeal was successful as CHRB does not accept that ‘policies developed in line with the UNGPs/OECD Guidelines’ are equivalent to ‘policy commitments to the UNGPs/OECD Guidelines, or their implementation’.

B.1.1. – Responsibility and Resources for Day to Day Human Rights Functions These appeals made it clear that CHRB should ensure companies understand that this indicator focused on ‘day to day’ management responsibilities, rather than board level committees or non-executive directors. While these posts may be ultimately responsible, they do not have day to day responsibility in large companies. That higher level of oversight is addressed in indicator A.2.3.

Multiple appeals were rejected where companies had failed to meet the expectations regarding commitments to respecting the human rights that the ILO has declared to be fundamental rights at work in A.1.2. This results in a domino effect where several of the Theme B indicators automatically score zero (as CHRB does not award points for ‘embedding respect in company culture and management systems’ if the underlying policies do not meet the expectations around ILO fundamental rights).

3. Acceptance & Rejection of Appeals

Overall, approximately 60% of appeals were rejected and 6% were partially rejected (i.e. a company asked to increase from 0 points to 2, but were awarded 1 point). The Appeals Panel overturned CHRB’s initial recommendation on three appeals, but in general the Appeals Panel accepted CHRB’s

recommendations. The high percentage of rejections in Themes A and B (75% to 67%) are discussed in more detail in the 'learnings for CHRB' section below.

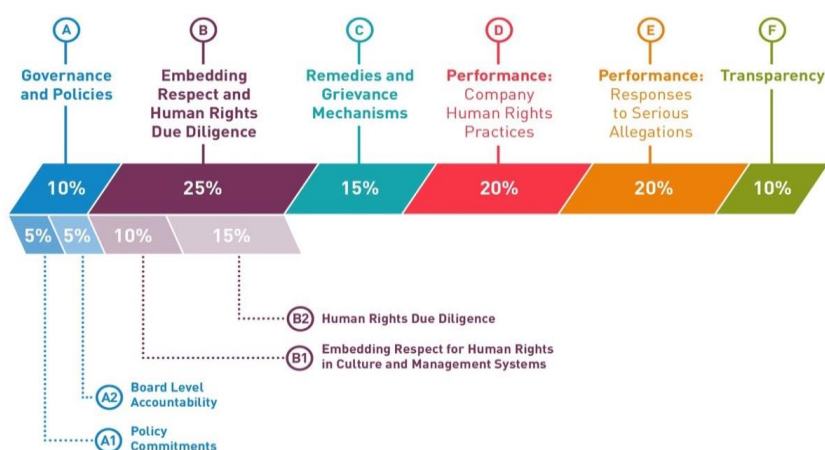
Where appeals were accepted, this was frequently down to companies pointing out evidence that existed during the initial research phase but was missed. It is apparent that where a company has many different key documents that touch on human rights, engagement with CHRB during the research process to is very useful in helping to prioritise researcher time. Conversely, a single overlooked document can have a knock-on effect for multiple indicators for one company. While CHRB admits that documents can be and were missed on occasion, this also highlights a very important question for companies to consider:

If professional researchers have trouble finding relevant information about a company's approach to human rights because it is spread across a wide range of documents (one company had over 100 different documents), is at different levels of publicly available information, or is in many different parts of the company website, how easy will it be for the interested public to access that information?

There are lessons to be learned in consolidating and communicating complex information on a company's approach to human rights in a way that does justice to the challenges and desire for information but at the same time is accessible via well marked signposts. The UNGP Reporting Framework provides a very useful guideline for organising relevant human rights management information and we encourage companies to use this resource. The forthcoming GRI guidance on reporting on human rights will also help companies decide on how to report on human rights in a meaningful manner.

E. IMPLICATIONS FOR SCORING

The CHRB Methodology is based on 6 themes, with weightings as set out below:



Where companies had successful appeals, they have been informed of the details and the online datasets and ranking will reflect this. The overarching theme and total score changes for the companies is set out below:

AB Inbev	Theme A	Theme B	Theme C	Theme D	Theme E	Theme F	Total	Change Band?
2018 Score	3.9	3.9	2.9	5.3	4.5	2.1	22.5	No
After Appeal	3.9	8.4	2.9	5.3	5.7	2.4	28.5	
Change	0	4.5	0	0	1.2 ⁴	0.3	+6	

Chevron	Theme A	Theme B	Theme C	Theme D	Theme E	Theme F	TOTAL	Change Band?
2018 Score	3.4	5.4	5.4	6.9	5.8	2	28.8	Yes
After Appeal	3.4	5.4	6.3	8.1	6.3	2.1	31.6	
Change	0	0	0.9	1.2	0.5	0.1	+2.8	

Glencore	Theme A	Theme B	Theme C	Theme D	Theme E	Theme F	Total	Change Band?
2018 Score	7	9.3	3.3	8.8	5	5.8	39.1	Yes
After Appeal	7	9.3	3.3	10	8.1	5.8	43.5	
Change	-	-	-	1.2	3.1	-	+4.4	

Goldcorp	Theme A	Theme B	Theme C	Theme D	Theme E	Theme F	Total	Change Band?
2018 Score	4.2	2.3	2.5	6.9	5	4	24.8	Yes
After Appeal	5.9	4.4	3.3	8.1	6.6	4.7	33.2	
Change	1.7	2.1	0.8	1.2	1.6	0.7	+8.4 ⁵	

Heineken NV	Theme A	Theme B	Theme C	Theme D	Theme E	Theme F	Total	Change Band?
2018 Score	5.1	13.9	5.4	0.5	7.5	4.8	37.2	Yes
After Appeal	5.1	17.3	6.3	0.5	7.5	5.5	42.1	
Change	0	3.4	0.9	0	0	0.7	+4.9	

Target	Theme A	Theme B	Theme C	Theme D	Theme E	Theme F	Total	Change Band?
2018 Score	1.3	1.8	2.1	7.2	0	3.5	15.9	No
After Appeal	1.3	1.8	2.1	7.7	2.5	3.6	19	
Change	0	0	0	0.5	2.5	0.1	+3.1	

⁴ AB Inbev, Goldcorp and Chevron had no serious allegations, so this Theme E score is a proxy score, based on scaling up the A-D & F scores. The increase in their other Theme scores results in this apparent shift, but does not represent an improvement in their actual approach to handling allegations of human rights abuses.

⁵ CHRB's first meaningful engagement with Goldcorp was during the appeals process, which brought to light several sources not covered in the initial research; CHRB will not take appeals in 2019 on missing references where companies did not engage.

If an investor or civil society organisation wants to engage with any of these companies and needs further explanation of where the scores have changed, they are invited to contact CHRB directly⁶.

Due to the scoring changes, there are linked positional changes in the 2018 rankings. A summary of these changes is included at Annex 1 and is reflected on the CHRB website. Overall it is interesting to note that the top 20 companies and the bottom 35 companies remain the same.

F. LEARNINGS FOR CHRB

The Appeals Process has proven very useful for CHRB, in particular the feedback from our Appeals Panel who have challenged us to justify our findings and recommendations. It has also been useful from a theory of change perspective to see where companies are comparing their own scores with their peers; this is a great validation of the idea that benchmarking can drive competition between companies.

However, it has also revealed that the brief justifications in company scorecards can result in confusion for companies. In 2018, we tried to make the scorecards more detailed in the 'Met', 'Not Met' descriptions provided to companies. But what may take an hour to investigate is still normally represented by a single sentence and this text may not capture all of the relevant justifications for a score. Therefore, if a company uses 'only' the quoted text provided in the scorecard to base an assessment on one of its peers, it may get a skewed idea about CHRB's research, or what constitutes meeting the criteria. This issue is difficult to address without overwhelming the scoring sheets with information, but it is a point that will be fed back into the research team.

However infrequently CHRB may miss a reference document, when this happens, it can have a material impact on the final score. As such, in this year's engagements, we will aim to better track the references provided by companies and cross check them with researchers. Linked to this point, the 2019 Appeals Process will only consider 'missed references' from companies who have engaged with CHRB during the initial research phases.

Being the first full-run of the appeals process, we were unsure what resources would be required. The multi-level review, bringing the Appeals Panel up to speed with the methodology, feedback to the companies, revising the scoring and write up have all taken more time than anticipated. In 2018 CHRB covered 101 companies. CHRB is covering 200 companies in 2019 and it is clear companies are becoming more and more sensitive to their points and ranking positions.

CHRB seeks to hold itself accountable and model strong accountability for other benchmarking initiatives but at the same time is seeking to accomplish an important public mission with limited resources. We therefore will be reflecting the lessons learned in a revised Appeals Process that will tighten the basis for appealing and limit it to cases where there are significant errors made in scoring. CHRB offers an engagement period to companies for the purpose of highlighting documents that the research team missed during the development of the draft scores and to let companies point out any misinterpretations. Any missed documents must be pointed out during that engagement process. In

⁶ The full feedback to companies runs to over 50 pages and forms the basis for this report.

the next round of the appeals process CHRB does not intend to accept appeals that are based on missed documentation where companies have declined the opportunity to engage.

G. KEY POINTS FOR ALL BENCHMARKED COMPANIES

Some of the questions raised during the appeals process provided CHRB with an indication of where further clarification is needed to better understand the methodology and how the assessment works. For ease of reference we have linked these points to indicators / themes:

Theme A – Policy Commitments

CHRB's expectations about policy level commitments reflect the clear expectations of the UNGPs; that companies are expected to make a clear commitment to respecting human rights, rather than general statements. Several companies have fallen down on Theme A indicators where wording in their own policies does not meet the expectation set by the UNGPs. For example, a human rights policy that is 'developed in line with / based on the UNGPs' is seen to be materially different to and weaker than 'a commitment to implement the UNGPs'. Similarly, 'recognising the principles of X' is not equivalent to 'fully endorsing and supporting the principles enshrined in X', while 'striving to ensure X rights are upheld' is not seen to be as strong as 'supporting the right to X'.

A specific area that had consequences for many companies in the 2018 assessment was their inability to meet part of the criteria for A.1.2 Score 1 (*The Company has a publicly available statement of policy committing it to respecting the human rights that the ILO has declared to be fundamental rights at work*) that then has a domino effect in Theme B (see below). Stating that 'our policies and procedures are consistent with ILO core labour principles concerning freedom of association and collective bargaining, non-discrimination, forced labour and underage workers' is not strong enough as it lacks the 'commitment to respect' that we are looking for. But a policy statement saying '*we are committed to the International Labour Organisation's core labour rights, covering the right to freedom of association and collective bargaining, the right to equal remuneration for equal work, and a zero-tolerance approach to forced labour, child labour and unfair discrimination*' would meet the criteria.

Domino Effect of failing to meet ILO expectations

Multiple indicators in Theme B are contingent on achieving a score of 1 in Indicator A.1.2 (for 1 point) and a score of 2 in Indicator A.1.2 (for 2 points). This means that for those companies who are unable to commit to the fundamental rights at work from the ILO (or the ten principles of the UN Global Compact), they will automatically score zero on several of the 'embedding respect for human rights in company culture and management systems'.

The general reasoning for this is that companies should not be credited for the full integration of its human rights policies where the policies themselves do not meet the expectations set by the UNGPs⁷.

⁷ This indicator was raised as overly complex in the 2018 assessment and was adjusted for the 2019 research to simplify it.

A.2.1 – Commitment from the Top Score 2

To reach a score 2 in A.2.1, CHRB requires that ‘Board members or the CEO make speeches, presentations or other communications setting out the Company’s approach to human rights or discussing its business importance.’ Some companies have tried to argue that CEO membership of external bodies, or engagements with investors featuring human rights, should count towards this indicator. We encourage companies to recognise that this indicator is focused on ‘public’ speeches, presentations and communications (in line with the CHRB’s focus on increasing transparency and researching publicly domain information). However, we recognise that this could be made more explicit in the next methodology.

B.1.1 – Responsibilities and resources for day-to-day human rights functions

There has been some clear confusion in interpretation, with many companies indicating that CEO/board level non-exec directors have been assigned responsibilities for relevant human rights issues. This level of responsibility is covered in Theme A, while B.1.1 is focused (as the indicator title suggests) on the day-to-day responsibilities. For the CHRB indicators, it is important to read the full text of the indicator, from the title to the description to the scoring to understand the purpose of the indicator.

B.1.1 Responsibility and resources for day-to-day human rights functions

Sources: UNGP 19; UNGPRF A2 and A2.1; GRI 102-19 and 102-20

The Company outlines senior level responsibility for human rights within the Company as well as the organisation of the day-to-day responsibility for human rights across relevant internal functions.

Note: Board level responsibility is assessed under indicator A.2.1 and therefore not considered in this indicator.

Score 1

The Company indicates the senior manager role(s) responsible for relevant human rights issues within the Company (i.e. responsibility for human rights is assigned to a senior manager(s)) and this includes the ILO core labour standards at a minimum.

Score 2

The Company also describes how day-to-day responsibility, resources and decision-making process are allocated across the range of relevant functions of the Company.

CHRB will look to make the ‘non-board’ element of score 1 more explicit in the future. In addition, this ‘non-board/non-exec level’ issue has also had similar implications for B.1.2, which again is focused on day-to-day management and we encourage companies to use the methodology text as their core reference, rather than the summarised versions in the scorecards.

H. SUMMARY

CHRB hopes the lessons taken from this Appeals Process will support both our ongoing work and the companies themselves to understand how they are assessed and ranked. A key takeaway is that without engagement with companies, CHRB researchers will sometimes struggle to identify every relevant document on a company website (as will the public), particularly where companies do not follow a recognised reporting framework such as the UNGP Reporting Framework. A second takeaway is that companies are increasingly interested in their scores and relative performance, and seeking to improve them on an ongoing basis.

CHRB encourages all companies to use the engagement process as the prime method of identifying additional references or discussing methodological questions and the 2019 Appeals Process will only consider appeals on the basis of 'missing references' where the company has meaningfully engaged with CHRB this year. We also strongly encourage companies to use the full Methodology as a key reference when reviewing scores or providing feedback as the scorecards do not reveal the full detail of the indicators.

While the 2019 Appeal Process may need to be streamlined, we will continue to have a process that recognises complaints from companies and that pushes us to constantly improve our approach to ranking companies. We would like to express our thanks to all the companies who participated.

ANNEX A

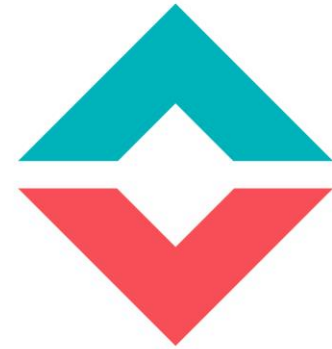
CHANGES IN RANKING FOLLOWING APPEALS

Posn	Ranking 2018	Band	Ranking 2018 Post Appeals	New Posn
1	Adidas	80 - 90	Adidas	1
2	Rio Tinto	70 - 80	Rio Tinto	2
3	BHP Billiton	70 - 80	BHP Billiton	3
4	Marks & Spencer Group	60 - 70	Marks & Spencer Group	4
5	Unilever	60 - 70	Unilever	5
6	ENI	60 - 70	ENI	6
7	VF	60 - 70	VF	7
8	The Coca-Cola Company	50 - 60	The Coca-Cola Company	8
9	Kellogg	50 - 60	Kellogg	9
10	Royal Dutch Shell	50 - 60	Royal Dutch Shell	10
11	Inditex	50 - 60	Inditex	11
12	Freeport-McMoRan	50 - 60	Freeport-McMoRan	12
13	Anglo American	50 - 60	Anglo American	13
14	Gap	50 - 60	Gap	14
15	Hennes & Mauritz	40 - 50	Hennes & Mauritz	15
16	BP	40 - 50	BP	16
17	Hanesbrands	40 - 50	Nestle	17
18	Nestle	40 - 50	Hanesbrands	18
19	Total	40 - 50	Total	19
20	Repsol	40 - 50	Repsol	20
			Glencore	21
21	PepsiCo	40 - 50	PepsiCo	22
22	Diageo	40 - 50	Diageo	23
			Heineken NV	24
23	Petrobras	40 - 50	Petrobras	25
24	Woolworths	40 - 50	Woolworths	26
25	Glencore	30 - 40		
26	ConocoPhillips	30 - 40	ConocoPhillips	27
27	Next	30 - 40	Next	28
28	Ecopetrol	30 - 40	Ecopetrol	29
29	Danone	30 - 40	Danone	30
30	Heineken NV	30 - 40		
31	Equinor	30 - 40	Equinor	31
32	Tesco	30 - 40	Tesco	32
33	Nike	30 - 40	Nike	33
		30 - 40	Goldcorp	34
		30 - 40	Chevron Corporation	35
34	General Mills	30 - 40	General Mills	36
35	Under Armour	30 - 40	Under Armour	37
36	Archer Daniels Midland	20 - 30	Archer Daniels Midland	38
37	Chevron Corporation	20 - 30		
38	Kering	20 - 30	Kering	39
		20 - 30	Anheuser-Busch InBev	40
39	Fast Retailing	20 - 30	Fast Retailing	41
40	Wesfarmers	20 - 30	Wesfarmers	42
41	Coal India	20 - 30	Coal India	43
42	Associated British Foods	20 - 30	Associated British Foods	44
43	Mondelez International	20 - 30	Mondelez International	45
44	Carrefour	20 - 30	Carrefour	46
45	Sasol	20 - 30	Sasol	47
46	Goldcorp	20 - 30		
47	Lukoil	20 - 30	Lukoil	48
48	Wal-Mart Stores	20 - 30	Wal-Mart Stores	49
49	Occidental Petroleum	20 - 30	Occidental Petroleum	50
50	Anheuser-Busch InBev	20 - 30		
51	Rosneft Oil	20 - 30	Rosneft Oil	51
52	McDonald's	20 - 30	McDonald's	52
53	Pernod-Ricard	20 - 30	Pernod-Ricard	53
54	Kroger	20 - 30	Kroger	54

Posn	Ranking 2018	Band	Ranking 2018 Post Appeals	New Posn
55	The Hershey Company	10 - 20	The Hershey Company	55
		10 - 20	Target	56
56	Suncor Energy	10 - 20	Suncor Energy	57
57	Ahold Delhaize	10 - 20	Ahold Delhaize	58
58	Exxon Mobil	10 - 20	Exxon Mobil	59
59	PTT	10 - 20	PTT	60
60	Grupo Mexico	10 - 20	Grupo Mexico	61
61	LVMH	10 - 20	LVMH	62
62	Aeon Company	10 - 20	Aeon Company	63
63	L Brands	10 - 20	L Brands	64
64	Target	10 - 20		
65	Sysco	10 - 20	Sysco	65
66	Compass Group	10 - 20	Compass Group	66
67	Norilsk Nickel	10 - 20	Norilsk Nickel	67
68	TJX Companies	10 - 20	TJX Companies	68
69	Anadarko Petroleum	10 - 20	Anadarko Petroleum	69
70	Marathon Petroleum	10 - 20	Marathon Petroleum	70
71	Yum! Brands	10 - 20	Yum! Brands	71
72	Canadian Natural Resources	10 - 20	Canadian Natural Resources	72
73	Kohl's	10 - 20	Kohl's	73
74	Tapestry	0 - 10	Tapestry	74
75	PetroChina	0 - 10	PetroChina	75
76	Phillips 66	0 - 10	Phillips 66	76
77	BRF	0 - 10	BRF	77
78	Costco Wholesale	0 - 10	Costco Wholesale	78
79	Starbucks	0 - 10	Starbucks	79
80	Nordstrom	0 - 10	Nordstrom	80
81	Falabella	0 - 10	Falabella	81
82	Devon Energy	0 - 10	Devon Energy	82
83	Oil & Natural Gas Corporation	0 - 10	Oil & Natural Gas Corporation	83
84	Gazprom	0 - 10	Gazprom	84
85	Ross Stores	0 - 10	Ross Stores	85
86	Kraft Heinz	0 - 10	Kraft Heinz	86
87	China Petroleum & Chemical	0 - 10	China Petroleum & Chemical	87
88	China Shenhua Energy	0 - 10	China Shenhua Energy	88
89	Macy's	0 - 10	Macy's	89
90	CNOOC	0 - 10	CNOOC	90
91	Prada	0 - 10	Prada	91
92	Shoprite	0 - 10	Shoprite	92
93	Hermes International	0 - 10	Hermes International	93
94	Surgutneftegas	0 - 10	Surgutneftegas	94
95	EOG Resources	0 - 10	EOG Resources	95
96	Alimentation Couche-Tard	0 - 10	Alimentation Couche-Tard	96
97	Valero Energy	0 - 10	Valero Energy	97
98	Monster Beverage	0 - 10	Monster Beverage	98
99	Heilan Home	0 - 10	Heilan Home	99
100	Kweichow Moutai	0 - 10	Kweichow Moutai	100
101	Vale	Suspended	Vale	101

The Corporate Human Rights Benchmark (CHRB):
Harnessing the competitive nature of the markets to drive better human rights performance.

CHRB



Corporate Human Rights Benchmark



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