

Company Name Asahi Group Holdings
Industry Agricultural Products (Supply Chain only)
Overall Score (*) 22.1 out of 100

| Theme Score | Out of | For Theme |
|-------------|--------|---|
| 3.4 | 10 | A. Governance and Policies |
| 9.5 | 25 | B. Embedding Respect and Human Rights Due Diligence |
| 1.3 | 15 | C. Remedies and Grievance Mechanisms |
| 0.0 | 20 | D. Performance: Company Human Rights Practices |
| 4.4 | 20 | E. Performance: Responses to Serious Allegations |
| 3.4 | 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 2019 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: Score 1</p> <ul style="list-style-type: none"> Met: General HRs commitment: The Company states that it respects the human rights and diverse values of all its employees. The respect for human rights is fundamental to everything it does. [Code of Conduct, 08/03/2019: asahigroup-holdings.com] Met: UNGC principles 1 & 2: Asahi Group Holdings states that 'is a signatory to the United Nations Global Compact, whose ten principles we are committed to upholding expresses support for the UN Global Compact and publishes the ten principles on its website'. [Human Rights Principles, 08/05/2019: asahigroup-holdings.com] Met: UDHR: The Company states that it is 'committed to respecting human rights that are recognized internationally and set out in the International Bill of Human Rights' and 'the International Bill of Human Rights refers to three internationally-recognized human rights documents: the Universal Declaration of Human Rights and its corresponding two international treaties, namely the International Covenant on Civil and Political Rights, and the International Covenant on Economic, Social and Cultural Rights'. [Human Rights Principles, 08/05/2019: asahigroup-holdings.com] Met: International Bill of Rights: Asahi Group discloses on its website that 'are committed to respecting human rights that are recognized internationally and set out in the International Bill of Human Rights' [Human Rights Principles, 08/05/2019: asahigroup-holdings.com] |

| Indicator Code | Indicator name | Score (out of 2) | Explanation |
|----------------|--|------------------|--|
| | | | <p>Score 2</p> <ul style="list-style-type: none"> Met: UNGPs: The Company states that 'are also committed to the United Nations Guiding Principles on Business and Human Rights'. [Human Rights Principles, 08/05/2019: asahigroup-holdings.com] |
| 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 states that 'are committed to respecting human rights that are recognized internationally and set out in the International Bill of Human Rights and the principles concerning fundamental rights in the International Labour Organization's Declaration on Fundamental Principles and Rights at Work.' [Human Rights Principles, 08/05/2019: asahigroup-holdings.com] Met: Explicitly list All four ILO for AG suppliers: The Company describes its commitment to ILO and states that expects 'our business partners, including our suppliers, to understand and uphold these Principles and to work with us to ensure that our business complies with these Principles'. As indicated below, the 'Human Rights principles include each ILO core area'. With respect freedom of association and collective bargaining, the Company states: 'We will respect the freedom of association and the right to collective bargaining in accordance with the applicable laws and regulations of the countries and regions where we do business. Where the right to freedom of association and collective bargaining is restricted under national/regional laws and regulations in contravention of international human rights standards, we will seek ways to honour these rights by establishing alternative means of dialogue with employees.' [Human Rights Principles, 08/05/2019: asahigroup-holdings.com] <p>Score 2</p> <ul style="list-style-type: none"> Met: Explicit commitment to All four ILO Core: The Company states that is committed to ILO and describes that 'ILO Declaration on Fundamental Principles and Rights at Work sets out principles concerning fundamental rights as minimum labor standards to be protected: freedom of association and the right to collective bargaining, elimination of all forms of forced or compulsory labor, the effective abolition of child labor, and the elimination of discrimination in respect of employment and occupation'. [Human Rights Principles, 08/05/2019: asahigroup-holdings.com] Met: Respect H&S of workers: The Company states that ensuring safety and health for employees at the work setting is one of the important responsibilities for a company. It endeavours to maintain and establish a safe and healthy environment. [Initiatives for Employee Safety and Health, 08/03/2019: asahigroup-holdings.com & Code of Conduct, 08/03/2019: asahigroup-holdings.com] Met: H&S applies to AG suppliers: The Company has established the CSR Principles for Asahi Group Suppliers. In the Principles suppliers, it said business partners should ensure that their working environments are safe and sanitary. [CSR Principles for Asahi Group Suppliers, 08/03/2019: asahigroup-holdings.com] |
| A.1.3.AG.a | 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 natural resources: The Company states that knows 'that our business can have impacts on human rights within the community, such as land rights, access to water, health, and the rights of indigenous peoples. We are committed to upholding our human rights responsibility in the communities in which we do business, and aim to contribute to a sustainable society'. However, there is no mention to commitment to respect land ownership and natural resources. [Human Rights Principles, 08/05/2019: asahigroup-holdings.com] Not met: Respecting the right to water: See above. [Human Rights Principles, 08/05/2019: asahigroup-holdings.com] Not met: Expecting suppliers to respect these rights: No evidence was found that Asahi Group expects its suppliers to respect these rights. [Human Rights Principles, 08/05/2019: asahigroup-holdings.com] <p>Score 2</p> <ul style="list-style-type: none"> Not met: Voluntary Guidelines on Tenure Rights: The Company does not states about its commitment to Voluntary Guidelines on Tenure Rights [Human Rights Principles, 08/05/2019: asahigroup-holdings.com] Not met: IFC Performance Standards: Asahi Group does not mention about IFC Performance Standards. [Human Rights Principles, 08/05/2019: asahigroup-holdings.com] Not met: FPIC for all: The Company does not states about free prior and informed consent (FPIC) from indigenous peoples and local communities [Human Rights Principles, 08/05/2019: asahigroup-holdings.com] Not met: Zero tolerance for land grabs: There is no mention about zero tolerance for land grabs. [Human Rights Principles, 08/05/2019: asahigroup-holdings.com] |

| Indicator Code | Indicator name | Score (out of 2) | Explanation |
|----------------|---|------------------|--|
| | | | <ul style="list-style-type: none"> • Not met: Respecting the right to water: The Company states that recognize that its operations can impact access to water but also states that is 'committed to upholding our human rights responsibility in the communities in which we do business, and aim to contribute to a sustainable society'. However, it is not clear if the company has a commitment to the right to water. [Human Rights Principles, 08/05/2019: asahigroup-holdings.com & Company website, Dialogue 2015: asahigroup-holdings.com] • Not met: Expecting suppliers to respect these rights: The Company does not explicitly mention that expect its suppliers to respect these rights, only in a general way, which is not enough for this indicator. [Human Rights Principles, 08/05/2019: asahigroup-holdings.com] |
| A.1.3.AG.b | Commitment to respect human rights particularly relevant to the industry – people’s rights (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: Women's rights: Although the Company states that 'will not discriminate against or commit any act that damages the dignity of any individual based on nationality, race, ethnicity, religion, ideology, gender, age, disability, gender identity, sexual orientation, or employment status, or any other protected characteristics as defined by national/regional laws and regulations', there is no mention about women's rights. [Human Rights Principles, 08/05/2019: asahigroup-holdings.com & Promotion of diversity, 08/03/2019: asahigroup-holdings.com] • Not met: Children's rights: Although the Company states that 'will not discriminate against or commit any act that damages the dignity of any individual based on nationality, race, ethnicity, religion, ideology, gender, age, disability, gender identity, sexual orientation, or employment status, or any other protected characteristics as defined by national/regional laws and regulations', there is no mention about children's rights. [Human Rights Principles, 08/05/2019: asahigroup-holdings.com] • Not met: Migrant worker's rights: Although the Company states that 'will not discriminate against or commit any act that damages the dignity of any individual based on nationality, race, ethnicity, religion, ideology, gender, age, disability, gender identity, sexual orientation, or employment status, or any other protected characteristics as defined by national/regional laws and regulations', there is no mention about migrant's rights. [Human Rights Principles, 08/05/2019: asahigroup-holdings.com] • 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 has promotion of diversity policy but there is no mention to a commitment to follow the principles of Convention on the Elimination of Discrimination Against Women or of the Women’s Empowerment Principles. [Promotion of diversity, 08/03/2019: asahigroup-holdings.com] • Not met: Child Rights Convention/Business Principles • Not met: Convention on migrant workers • 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: Regular stakeholder engagement: The Company reports regular meetings with workers' union council. In 2017 the meeting was held in June. The Company also discloses engagement with employees through surveys, for which it discloses overall scores by gender in 11 topics including respect for individuals, sustainable engagement, growth opportunities, remuneration and welfare, etc. [Evaluation and Treatment, 15/03/2019: asahigroup-holdings.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Commits to engage stakeholders in design: Although the Company states that the support for the human rights of each employee is being enhanced, no evidence found of commitment to engage with affected stakeholders in the development or monitoring of the human rights approach. [Communication with stakeholders, 08/03/2019: asahigroup-holdings.com] • 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: The Company states that 'will strive to avoid infringing human rights or contributing to human rights infringements by stakeholders, including our suppliers and other business partners. If we identify that we have caused or contributed to such infringement, we will endeavor to remediate such impacts'. However, to 'strive' and to 'endeavor' do not describe a formal commitment. Also the Company describe its grievance mechanism but this |

| Indicator Code | Indicator name | Score (out of 2) | Explanation |
|----------------|--|------------------|---|
| | | | indicator looks for a broader approach to remedy any impact caused or contributed to. [Human Rights Principles, 08/05/2019: asahigroup-holdings.com] Score 2 <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 | The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Zero tolerance attacks on HRs Defenders (HRDs) Score 2 <ul style="list-style-type: none"> • Not met: Expects AG suppliers to reflect company HRD commitments |

A.2 Policy Commitments (5% of Total)

| Indicator Code | Indicator name | Score (out of 2) | Explanation |
|----------------|---------------------------------------|------------------|--|
| A.2.1 | Commitment from the top | 1 | The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: CEO or Board approves policy: The Company released the statement under the UK Modern Slavery Act, which was approved by the Board of Directors and shared the statement on its website. [Asahi Group Statement under the UK Modern Slavery Act, 08/05/2018: asahigroup-holdings.com] • Met: Board level responsibility for HRs: The Company states that "at the Asahi Group, risks are evaluated and controlled by the Risk Management Committee established in accordance with the Asahi Group Risk Management Regulations, which are risk control standards given top priority within the internal control systems of the Asahi Group. This Committee consists of the directors, the general manager of the General Affairs and Legal Affairs Section and other persons who were appointed separately by the Committee. Modern slavery and other risks to human rights will be evaluated and controlled under this framework." [Asahi Group Statement under the UK Modern Slavery Act, 08/05/2018: asahigroup-holdings.com & Convocation Notice of The 95th Annual General Meeting of Shareholders, 26/03/2019: asahigroup-holdings.com] Score 2 <ul style="list-style-type: none"> • Not met: Speeches/letters by Board members or CEO: On its President's message the Company states that 'will strengthen our risk management in fields such as the environment, human rights and alcohol-related problems, and link it with the solution of issues confronting society through activities for creating shared value (CSV) that make the most of the strengths of the Asahi Group'. However, the letter does not address the company's human rights position. [President's message, 2019: asahigroup-holdings.com] |
| 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: The Company states that 'The Board of Directors of Asahi Group Holdings, Ltd. is responsible for ensuring adherence to our human rights commitments and has responsibility for overseeing the implementation of these commitments. However, the Company does not describes the process it has in place to discuss and address human rights issues at Board level. [Human Rights Principles, 08/05/2019: asahigroup-holdings.com] • Not met: Examples or trends re HR discussion: The Company discloses that 'In 2019, the Board discussed publishing the Principles and the first discussion about the report will be in 2020'. However, there is no clear examples of specific human rights issues discussed [Human Rights Principles, 08/05/2019: asahigroup-holdings.com] Score 2 <ul style="list-style-type: none"> • Not met: Both examples and process |
| A.2.3 | Incentives and performance management | 0.5 | The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Incentives for at least one board member: The Company discloses in its Corporate Governance Report on the section, Incentive Policies for Directors, that 'medium-term performance-linked bonuses are determined using financial and social value indicators set in line with the goals of the "Medium-Term Management policy" as performance benchmarks in proportion to the level of achievement of targets, which are set at the beginning of each fiscal year. The Medium-Term Management policy includes 'developing a human rights management system' under the 'Reinforcing ESG initiatives supporting our sustainable value creation process' section'. [Corporate Governance Report, 26/03/2019: asahigroup-holdings.com & Medium-Term Management Policy, 2019: asahigroup-holdings.com] |

| Indicator Code | Indicator name | Score (out of 2) | Explanation |
|----------------|----------------|------------------|---|
| | | | <ul style="list-style-type: none"> • Not met: At least one key AG HR risk, beyond employee H&S Score 2 <ul style="list-style-type: none"> • Met: Performance criteria made public: The Company discloses that 40% of Medium-term bonuses of boards are based on social value indication. [Integrated Report - The Asahi Group's Governance, 2018: asahigroup-holdings.com] |

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"> • Met: Commits to ILO core conventions: See indicator A.1.2 [Initiatives on Respect for Human rights, 08/03/2019: asahigroup-holdings.com] • Not met: Senior responsibility for HR: The Company states that risks are evaluated and controlled by the Risk management committee, which consists of the directors, the general manager of the General affairs and Legal affairs section and other persons who were appointed separately by the Committee. Modern slavery and other risks to human rights will be evaluated and controlled under this framework. Also the Company states that 'The Board of Directors of Asahi Group Holdings, Ltd. is responsible for ensuring adherence to our human rights commitments and has responsibility for overseeing the implementation of these commitments.' However, there is no description about a specific senior manager who is responsible for human rights. [Asahi Group Statement under the UK Modern Slavery Act, 08/05/2018: asahigroup-holdings.com & Human Rights Principles, 08/05/2019: asahigroup-holdings.com] Score 2 <ul style="list-style-type: none"> • Met: Day-to-day responsibility: The Company states that rules on confirmation of the status of compliance with policies, etc. related to human rights and handling of risks related to human rights are factored into the Group-wide systems for promoting compliance and risk management. In addition, it has established a human resources committee at each of the group companies. [Upholding Respect for Human Rights, 08/03/2019: asahigroup-holdings.com & Developing Human Resources on a Global Basis, 08/03/2019: asahigroup-holdings.com] • Met: Day-to-day responsibility for AG in supply chain: The Company has established the Procurement clean line system for suppliers as consultation offices related to human rights and compliance. These systems are operated by the General & Legal affairs management department. [Upholding Respect for Human Rights, 08/03/2019: asahigroup-holdings.com] |
| 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 • Not met: At least one key AG HR risk, beyond employee H&S Score 2 <ul style="list-style-type: none"> • Not met: Performance criteria made public |
| B.1.3 | Integration with enterprise risk management | 1 | The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: HR risks is integrated as part of enterprise risk system: The Company has developed compliance and risk control frameworks and other internal control systems for all companies within the entire group, for which the representative directors have ultimate responsibility. Effects of modern slavery and other risks on human rights will be evaluated under the systems. [Asahi Group Statement under the UK Modern Slavery Act, 08/05/2018: asahigroup-holdings.com] Score 2 <ul style="list-style-type: none"> • Not met: Audit Ctte or independent risk assessment: The Company states that 'it is the Representative Director(s) who shall assume the ultimate responsibility for the improvement of the Internal Control System and demand the Representative Director(s) to ensure the Directors and Corporate Officers, through the respective departments and organizations they are in charge of, to develop and fully enforce individual internal regulations that will be applied to the Company and the entire Asahi Group and are required based on the Basic Policies'. However, no evidence found of a description of how it particularly assesses the adequacy of the system in managing human rights during last reporting year. [Asahi Group Statement under the UK Modern Slavery Act, 08/05/2018: asahigroup-holdings.com & Convocation Notice of The 95th Annual General Meeting of Shareholders, 26/03/2019: asahigroup-holdings.com] |

| Indicator Code | Indicator name | Score (out of 2) | Explanation |
|----------------|--|------------------|--|
| B.1.4.a | Communication /dissemination of policy commitment(s) within Company's own 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"> • Met: Commits to ILO core conventions: See indicator A.1.2 [Initiatives on Respect for Human rights, 08/03/2019: asahigroup-holdings.com] • Not met: Communicates its policy to all workers in own operations: The Company states that it conducts employee training and raises employees' awareness of respect for human rights, aiming to increase each person's understanding of human rights. Also on its website the Company discloses that 'In order to implement and comply with these Principles throughout Asahi Group, we will seek to translate these Principles into relevant languages for the countries and regions where we do business and provide training and education to all officers and employees'. However, no evidence found of policies being communicated to all employees including in local languages where necessary and to seek to translate does not imply that the communication is already being made. [Initiatives on Respect for Human rights, 08/03/2019: asahigroup-holdings.com & Human Rights Principles, 08/05/2019: asahigroup-holdings.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Commits to all 4 ILO core conventions: See indicator A.1.2 [Code of Conduct, 08/03/2019: asahigroup-holdings.com & Human Rights Principles, 08/05/2019: asahigroup-holdings.com] • 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 | 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: Commits to all 4 ILO core conventions for suppliers: See indicator A.1.2 [Human Rights Principles, 08/05/2019: asahigroup-holdings.com] • Met: Communicating policy down the whole AG supply chain: The Company conducts the Supplier CSR survey every three years. The findings from the survey will be used to provide direct feedback to suppliers and also as the basis for on-site interviews with suppliers based on the survey results in its efforts to find solutions to the issues identified. The CSR survey contains questions about comparison of Company's policies with suppliers and how equivalent they are and about training in the policies. [Supplier CSR Survey, 08/03/2019: asahigroup-holdings.com] • Not met: Requiring AG suppliers to communicate policy down the chain <p>Score 2</p> <ul style="list-style-type: none"> • Met: How HR commitments made binding/contractual: The Company states that it selects new suppliers by evaluating including human rights, and a trade contract agreement clearly prescribing compliance with the relevant laws etc. is drawn up. [Cooperation with Suppliers, 15/03/2019: asahigroup-holdings.com] • Not met: Including on AG suppliers |
| B.1.5 | Training on Human Rights | 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: Scores at least 1 on A.1.2 • Met: Trains all workers on HR policy commitments: The Company states that it conducts employee training and raises employees' awareness of respect for human rights, aiming to increase each person's understanding of human rights. In addition the Company discloses that provides training and education to all officers and employees. [Initiatives on Respect for Human rights, 08/03/2019: asahigroup-holdings.com & Human Rights Principles, 08/05/2019: asahigroup-holdings.com] • Not met: Trains relevant AG managers including procurement: The Company states that persons in charge of procurement at the Procurement Section and Group companies are striving to improve their knowledge of procurement, including CSR procurement, through the acquisition of Certified Procurement Professional (CPP) qualifications by the Japan Management Association. However it is not clear that the qualifications covers human rights. [Implementing Effective Supply-Chain Management, 15/03/2019: asahigroup-holdings.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Score of 2 on A.1.2 • Not met: Both requirements under score 1 met |
| B.1.6 | Monitoring and corrective actions | 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: Scores at least 1 on A.1.2 • Met: Monitoring implementation of HR policy commitments: The Company states that the main human right-related monitoring was conducted for fiscal 2017. The Company describes carrying out anonymous survey on compliance in corporate officers and employees in Japan. It also describes a reporting and response system for consultation related to human rights issues at each group company, including a |

| Indicator Code | Indicator name | Score (out of 2) | Explanation |
|----------------|---|------------------|--|
| | | | <p>consultation service. [Asahi Group Statement under the UK Modern Slavery Act, 08/05/2018: asahigroup-holdings.com]</p> <ul style="list-style-type: none"> • Met: Monitoring AG suppliers: The Company states that its suppliers report on their human rights initiatives via the Supplier CSR Survey, which is conducted every three years. The responses to this survey are reflected in supplier evaluations and are used as the basis for future business transactions. The findings from the Survey will be used to provide direct feedback to suppliers and also as the basis for on-site interviews with suppliers based on the survey results in its efforts to find solutions to the issues identified. [Initiatives on Respect for Human rights, 08/03/2019: asahigroup-holdings.com & Supplier CSR Survey, 08/03/2019: asahigroup-holdings.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Score of 2 on A.1.2 • Not met: Describes corrective action process: The Company reports that in 2017, there were 24 industrial accidents at Asahi Group's factories and research laboratories. Also the Company describes its Survey Overview with Company's Group. However, the Company does not describe its corrective action process when some irregularity is found. [Initiatives for Employee Safety and Health, 08/03/2019: asahigroup-holdings.com & Supplier CSR Survey, 2019: asahigroup-holdings.com] • Not met: Example of corrective action • Not met: Discloses % of AG supply chain monitored: The Company reports that in January 2017, it conducted the Supplier CSR assessment for 103 key suppliers in Japan out of approximately 900 suppliers, accounting for 73% of purchase value within Japan. The Supplier CSR Survey is conducted every three years. However for awarding this indicator, global data is needed. [Supplier CSR Survey, 08/03/2019: asahigroup-holdings.com & Asahi Group Statement under the UK Modern Slavery Act, 08/05/2018: asahigroup-holdings.com] |
| B.1.7 | Engaging business relationships | 0 | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: HR affects AG selection of suppliers: The Company states that before starting to work with a new business partner, one of its subsidiaries, Asahi Breweries, checks the same information as the Supplier CSR Survey. It requires the new business partner to adhere to the CSR principles for Suppliers before signing a contract. However, this seems to apply to one segment of operation. No evidence found of this practice (or other related) being widely implemented. [Initiatives on Respect for Human rights, 08/03/2019: asahigroup-holdings.com] • Not met: HR affects on-going AG supplier relationships: The Company states that its suppliers report on their human rights initiatives via the Supplier CSR Survey, which is conducted every three years. The responses to this survey are reflected in supplier evaluations and are used as the basis for future business transactions. However, no further details found on how this can affect the relationship (extended contracts, termination, etc). [Initiatives on Respect for Human rights, 08/03/2019: asahigroup-holdings.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirement under score 1 met • Not met: Working with AG 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 • Not met: Workers in AG SC engaged • Not met: Communities in the AG 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 indicates that 'together with external experts, we reviewed past case studies that had come to light in countries around the world as well as publicly disclosed information, in order to identify the human rights related risks present in the industry and categorize them into issues affecting each stakeholder. We also studied the Asahi Group's current response to these risks with external experts'. [Initiatives on Respect for Human Rights, 2019: asahigroup-holdings.com & Integrated report, 31/12/2017: asahigroup-holdings.com] |

| Indicator Code | Indicator name | Score (out of 2) | Explanation |
|----------------|---|------------------|---|
| | | | <ul style="list-style-type: none"> • Met: Identifying risks in AG suppliers: Although the Company does not mention business partners in the process described above, they seem to be included in the process as the Company discloses the relevant issues that resulted from the assessment for 'employees of the Asahi Group and its business partners'. [Initiatives on Respect for Human Rights, 2019: asahigroup-holdings.com] Score 2 • Met: Ongoing global risk identification: The Company carried out the identification of issues and the formulation of Human rights principles in 2019. [Initiatives on Respect for Human Rights, 2019: asahigroup-holdings.com] • Not met: In consultation with stakeholders • Met: In consultation with HR experts: As indicated above, the Company worked with 'experts' in the identification of human rights issues and risks through the review of past case studies and studying Asahi Group's current response to these risks. [Initiatives on Respect for Human Rights, 2019: asahigroup-holdings.com] • 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) | 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: Salient risk assessment (and context): The Company conducted theoretical analysis of modern slavery risk in 17 countries where its manufacturing plants are located, covering 11 of the key raw ingredients it procures. The results of the analysis indicated that modern slavery risk was 'very high' and 'high' at seven of the countries. 11 items were selected based on the level of assumed risk and procurement volume. The level of modern slavery risk differed according to the country or region. Analysis indicated that growing crops held the highest level of modern slavery risk in the value chain. Also, on its website, describing human rights initiatives, it explains that the identification process for human rights issues and risks involved the review of case studies in countries around the world, in order to identify risks present in its industry and affecting each of its stakeholders. It states 'we assessed the level of importance [...] by assigning a score to each item based on factors including the level of severity within the industry, the level of importance, any shortcomings in our current response in comparison to industry or international standards, and Company's potential to play an influential role'. [Asahi Group Statement under the UK Modern Slavery Act, 08/05/2018: asahigroup-holdings.com & Modern Slavery Risk Analysis, 15/03/2019: asahigroup-holdings.com] • Met: Public disclosure of salient risks: The results of the assessment by stakeholder show the following, among other stakeholders: 'Employees of the Asahi Group and its business partners: working hours, wages, workplace health and safety, discrimination, inhumane treatment, freedom of association/collective bargaining rights, forced labor, child labor, right to privacy, treatment of migrant workers'; 'Local communities: access to water, rights of indigenous populations (land issues), other community related issues'. [Human Rights Principles, 08/05/2019: asahigroup-holdings.com & Initiatives on Respect for Human Rights, 2019: asahigroup-holdings.com] Score 2 • 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: The Company describes that it is working on a PDCA to identify and mitigate human rights risks. However, it is not clear if it is already in practice or if it is still being developed. [ASAHI GROUP INTEGRATED REPORT, 2018: asahigroup-holdings.com] • Not met: Including in AG supply chain • Not met: Example of Actions decided Score 2 • 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: The Company states that it is developing a PDCA to identify human rights risk, but as the Company described its human-rights due diligence will be launched and implemented in 2021. So, it is not clear if the company has some measures in place now or if the system will only be implemented in 2021. [ASAHI GROUP INTEGRATED REPORT, 2018: asahigroup-holdings.com] • Not met: Lessons learnt from checking effectiveness Score 2 • Not met: Both requirements 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 | 0.5 | <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: Comms plan re identifying risks: See indicator B.2.1. The Company carried out a human rights issue identification process involving supply chain and with the collaboration of experts. [Initiatives on Respect for Human Rights, 2019: asahigroup-holdings.com] • Met: Comms plan re assessing risks: See indicator B.2.2. The Company describes what considered in the assessment and disclosed a list of salient issues by stakeholder [Initiatives on Respect for Human Rights, 2019: asahigroup-holdings.com] • Not met: Comms plan re action plans for risks • Not met: Comms plan re reviewing action plans • Not met: Including AG suppliers <p>Score 2</p> <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 | <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: Channel accessible to all workers: Employees who observe or suspect a possible violation of applicable laws and regulations of the countries and regions where we do business or of our internal policies, are encouraged to report their concerns with their supervisors, and/or through our internal hotline/whistleblowing systems. The Company has established the Clean line system for employees as consultation offices related to human rights and compliance. These systems are operated by the General & Legal affairs management department. [Company's website, Corporate governance section, 2019: asahigroup-holdings.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Number grievances filed, addressed or resolved: The Company reported a total of 41 grievances in 2018. The types of clean line reports are divided in the categories Harassment/bad behavior, Mismanagement of employees, Violation of laws, regulations or company rules, Using company resources for personal gain and other. Although the company report 'harassment/bad behaviour, there is no breakdown and it is not clear how many are related to other topics connected to human rights issues. [Promotion of CSR Procurement, 15/03/2019: asahigroup-holdings.com & Company's website, Corporate governance section, 2019: asahigroup-holdings.com] • Not met: Channel is available in all appropriate languages: Although the Company states that provides a grievance mechanism, it is not clear if its available in all appropriated languages where the Company operates. [Human Rights Principles, 08/05/2019: asahigroup-holdings.com] • Not met: Expect AG supplier to have equivalent grievance systems: The Procurement Clean Line System enables our suppliers and parties wishing to become our suppliers to report incidents where employees of the Asahi Group act in a manner contrary to the Asahi Group Basic Procurement Policies, or when they are involved in activities that appear not to comply with the law or social ethics. However, there is no mechanism for suppliers' employees complaint about the supplier. The company does disclose information on number of complaints [CSR Principles for Asahi Group Suppliers, 08/03/2019: asahigroup-holdings.com & Procurement Clean Line System: asahigroup-holdings.com] • Not met: Opens own system to AG supplier workers: The Company has established a Procurement clean line system for suppliers as consultation offices related to human rights and compliance. However, it is not a mechanism which enables suppliers' employees to complain about suppliers [Promotion of CSR Procurement, 15/03/2019: asahigroup-holdings.com & Upholding Respect for Human Rights, 08/03/2019: asahigroup-holdings.com] |
| C.2 | Grievance channel(s)/mechanism(s) to receive complaints or concerns from external | 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: Grievance mechanism for community: The Company states that it has customer survey channel using postcards. However, it is not sufficient as evidence for this indicator. [Appropriate Response and Support to Consumers, 15/03/2019: asahigroup-holdings.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Describes accessibility and local languages • Not met: Expects AG supplier to have community grievance systems |

| Indicator Code | Indicator name | Score (out of 2) | Explanation |
|----------------|--|------------------|---|
| | individuals and communities | | <ul style="list-style-type: none"> • 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: The Company states that all notifications are thoroughly investigated by the general manager of the General & Legal affairs management section or equivalent and then dealt with as appropriate. The Corporate Ethics rules guarantee confidentiality and stipulate that no person shall suffer detrimental treatment as a result of making a notification. Also, the Company states that investigated and dealt with most of the concerns we received. However, the Company does not indicate the timescales for addressing the complaints or concerns in a public document. [Corporate Governance, 15/03/2019: asahigroup-holdings.com & Company's website, Corporate governance section, 2019: asahigroup-holdings.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: How complainants will be informed <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 | 0.5 | <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: Public statement prohibiting retaliation: The Company states that 'Employees or interested stakeholders who report or notify possible breaches will not be disadvantaged in any way. On the contrary, their reports and notifications will be well received as an opportunity for us to increase the transparency of Asahi Group's business activities, and help strengthen the mutual trust we have with our stakeholders'. [Human Rights Principles, 08/05/2019: asahigroup-holdings.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Practical measures to prevent retaliation <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-based judicial and non-judicial grievance mechanisms | 0 | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Won't impede state based mechanisms • Not met: Complainants not asked to waive rights <p>Score 2</p> <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 | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Describes how remedy has been provided: The Company describes on its annual report that will start a human rights due diligence PDCA process and will establish and subsequently enhance grievance mechanisms for receiving reports from affected people such as its Clean line system. In addition, the Company states that its initiative in 2019 is to formulate plans for PDCA processes and in 2020 will Establishment and subsequent enhancement of systems for providing access to relief for victims. Also, Asahi states that 'are committed to continue enhancing our capacity to identify and respond to human rights impacts resulting from our business operations'. However, there is no description about actual approach it took to provide or enable a timely remedy for victims, only about next years. [ASAHI GROUP INTEGRATED REPORT, 2018: asahigroup-holdings.com & Human Rights Principles, 08/05/2019: asahigroup-holdings.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Says how it would remedy key sector risks <p>Score 2</p> <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.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 • 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 demonstrating progress |
| 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): The Company states that 'will provide fair and just opportunities to the Suppliers both at home and abroad, regardless of the scale of a company'. However, there is no description about it measurement to avoids business model pressure on human rights related to purchasing practices. [Group Basic Procurement Policies, 2019: asahigroup-holdings.com] Score 2 <ul style="list-style-type: none"> • Not met: Positive incentives to respect human rights (purchasing practices) • 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 <ul style="list-style-type: none"> • Not met: Identifies suppliers back to manufacturing sites (factories or fields): The Company states that there are approximately 900 suppliers that supply to group companies in Japan. Also, the Company describes its questionnaire Supplier CSR Questionnaire and 470 suppliers answered it. However, it is not described how the Company maps and identifies its direct and indirect suppliers. [Asahi Group Statement under the UK Modern Slavery Act, 08/05/2018: asahigroup-holdings.com] Score 2 <ul style="list-style-type: none"> • Not met: Discloses significant parts of SP and why |
| D.1.4.b | Prohibition on child labour: Age verification and corrective actions (in the supply chain) | 0 | The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Child Labour rules in codes or contracts: The Company states that it 'will not engage in child labor, nor any form of modern slavery including human trafficking. Also the Company states that has established the CSR Principles for Asahi Group Suppliers requiring its business partners to ensure that their working environments are safe and sanitary, eliminate forced labor as well as discrimination and to effectively abolish child labor'. However, there is no evidence of age verification requirement. [Human Rights Principles, 08/05/2019: asahigroup-holdings.com & Asahi Group Statement under the UK Modern Slavery Act, 08/05/2018: asahigroup-holdings.com] Score 2 <ul style="list-style-type: none"> • Not met: How working with suppliers on child labour • Not met: Both requirements under score 1 met • Not met: Analysis of trends in progress made |
| D.1.5.b | Prohibition on forced labour: Debt bondage and other unacceptable financial costs (in the supply chain) | 0 | The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Debt and fees rules in codes or contracts • Not met: How working with suppliers on debt & fees Score 2 <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met • Not met: Analysis of trends in progress made |
| D.1.5.d | Prohibition on forced labour: Restrictions on workers (in the supply chain) | 0 | The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Free movement rules in codes or contracts: Asahi Group states that will not engage in forced labor, child labor, nor any form of modern slavery including human trafficking. Furthermore, the Asahi Group has established the CSR Principles for Asahi Group Suppliers requiring its business partners to ensure that their working environments are safe and sanitary, eliminate forced labor as well as discrimination and to effectively abolish child labor. However, there is no mention how the Company does it, more specifically if its on the contract with suppliers and if there is no retention of personal identification or travel documents. [Human Rights Principles, 08/05/2019: asahigroup-holdings.com & Asahi Group Statement under the UK Modern Slavery Act, 08/05/2018: asahigroup-holdings.com] Score 2 <ul style="list-style-type: none"> • Not met: How working with suppliers on free movement |

| Indicator Code | Indicator name | Score (out of 2) | Explanation |
|----------------|---|------------------|--|
| | | | Score 2 <ul style="list-style-type: none"> Not met: Both requirements under score 1 met Not met: Provides analysis of trends demonstrating progress |
| D.1.6.b | Freedom of association and collective bargaining (in the supply chain) | 0 | The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: FoA & CB rules in codes or contracts: Asahi Group states that will respect the freedom of association and the right to collective bargaining in accordance with the applicable laws and regulations of the countries and regions where we do business. However, the Company does not describe its measures to prohibit any form of intimidation or retaliation against workers seeking to exercise these rights [Human Rights Principles, 08/05/2019: asahigroup-holdings.com] Not met: How working with suppliers on FoA and CB Score 2 <ul style="list-style-type: none"> Not met: Both requirements under score 1 met Not met: Provides analysis of trends demonstrating progress |
| D.1.7.b | Health and safety: Fatalities, lost days, injury rates (in the supply chain) | 0 | The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: Sets out clear Health and Safety requirements: In the CSR principles for Suppliers, it states that business partners should ensure that their working environments are safe and sanitary. However, no further evidence found on requirements regarding health and safety. [Implementing Effective Supply-Chain Management, 15/03/2019: asahigroup-holdings.com] Not met: Injury Rate disclosures Not met: Lost days or near miss disclosures Not met: Fatalities disclosure Score 2 <ul style="list-style-type: none"> Not met: How working with suppliers on H&S Not met: Provides analysis of trends demonstrating progress |
| D.1.8.b | Land rights: Land acquisition (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 land & owners in codes or contracts Not met: How working with suppliers on land issues Score 2 <ul style="list-style-type: none"> Not met: Both requirements under score 1 met Not met: Provides analysis of trends demonstrating progress |
| 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 Not met: How working with suppliers on water stewardship issues: The Company carries out the survey to analyse water risk in the production processes of raw materials and assess the economic impact on Group businesses. Items related to water were incorporated into the Supplier Quality Audit, which allows the Company to monitor on an ongoing basis the potential impact of restricted availability of water on factory operations as well as procurement of raw production materials. The supplier quality audit that includes water issues also "helps to raise awareness of water risks among procurement teams in the Asahi Group and encourages the development of collaborative and constructive solutions together with suppliers". However, it is not clear how it specifically works with them to improve suppliers' practices in relation to this issue. [Water Risk Survey, 30/03/2019: asahigroup-holdings.com] Score 2 <ul style="list-style-type: none"> Not met: Both requirements under score 1 met Not met: Provides analysis of trends demonstrating progress |
| 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: Provides analysis of trends demonstrating progress |

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

| Indicator Code | Indicator name | Score (out of 2) | Explanation |
|----------------|-------------------------|------------------|--|
| E(1).0 | Serious allegation No 1 | | No allegations meeting the CHRB severity threshold were found, and so the score of 17.66 out of 80 points scored in themes A-D & F has been applied to produce a score of 4.42 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 | 1.43 out of 4 | Out of a total of 42 indicators assessed under sections A-D of the benchmark, Asahi Group Holdings made data public that met one or more elements of the methodology in 15 cases, leading to a disclosure score of 1.43 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 reporting against the Global Reporting Initiative (GRI). [Sustainability Reporting Guidelines, 08/03/2019] • Not met: Company reports on SASB • Not met: Company reports on UNGPRF |
| F.3 | Key, High Quality Disclosures | 0 out of 4 | Asahi Group Holdings met 0 of the 8 thresholds listed below and therefore gets 0 out of 4 points for the high quality disclosure indicator. Specificity and use of concrete examples <ul style="list-style-type: none"> • 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 <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 2019 Key Findings report and technical annex 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.