

Corporate Human Rights Benchmark 2019 Company Scoresheet



Company Name BOE Technology Group

Industry ICT (Own operations and Supply Chain)

Overall Score (*) 5.3 out of 100

Theme Score	Out of	For Theme
0.6	10	A. Governance and Policies
0.0	25	B. Embedding Respect and Human Rights Due Diligence
0.4	15	C. Remedies and Grievance Mechanisms
0.8	20	D. Performance: Company Human Rights Practices
1.1	20	E. Performance: Responses to Serious Allegations
2.5	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	0	The individual elements of the assessment are met or not as follows: Score 1 Not met: General HRs commitment Not met: UNGC principles 1 & 2 Not met: UDHR Not met: International Bill of Rights Score 2 Not met: UNGPs Not met: OECD
A.1.2	Commitment to respect the human rights of workers	0.5	The individual elements of the assessment are met or not as follows: Score 1 Not met: ILO Core Not met: UNGC principles 3-6 Not met: Explicitly list ALL four ILO for ICT suppliers Score 2 Not met: Explicit commitment to All four ILO Core: The Company states that "The Company prohibits the use of child laborers and eliminates forced labor. It forbids the use of violence, threats or unlawful restrictions on personal freedom to force employees to work and restrict the freedom of employees (jobs, resignations), and strictly prohibits physical punishment, intimidation, harassment, abuse, and any act that discriminates against employees" Moreover, it claims that "The coverage rate of trade unions in various entities, the rate of employees joining trade unions, and the proportion of employees signing the collective negotiation agreement are all

Indicator Code	Indicator name	Score (out of 2)	Explanation
			100%" However, there is no reference to freedom of association. [Sustainability Report, 2017: waterdrop.cc & Sustainability Report 2018, 2019: waterdrop.cc] • Met: Respect H&S of workers: On its CSR report the company state that, in order to ensure the scientific, reasonable and systematic operation of the Company's safety management, 18 subsidiaries under BOE have passed OHSAS 18001 Occupational Health and Safety Management System Certification and have carried out self-discovery and self-correction according to the systematic requirements annually." The company has several health and safety programmes under it's 'Safeguarding Employees' Rights and Interests.' [Sustainability Report, 2017: waterdrop.cc & Sustainability Report 2018, 2019: waterdrop.cc] • Not met: H&S applies to ICT suppliers • Not met: Working hours for Workers • Not met: Working hours for ICT suppliers
A.1.3.ICT.a	Commitment to responsible sourcing of minerals	0.5	The individual elements of the assessment are met or not as follows: Score 1 Not met: Responsible mineral sourcing in conflict areas: The Company states that "In the implementation of raw material procurement policies, BOE has abided by OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas prepared by CFSI, the UN and OECD. The Company and all its suppliers and outsourcers only purchase from smelting plants and refineries approved or certified by CFS, LBMA, or Responsible Jewelry Council. They do not purchase or support the use of any conflict minerals that directly or indirectly fund or support areas affected by armed conflicts, ensuring that all suppliers adopt responsible practices when purchasing minerals and respect human rights and environment in conflict-affected areas." However, it is not clear whether there is a commitment to responsible sourcing (not financing/benefitin armed groups and respecting human rights) that is extensive to high risk areas beyond conflict-affected areas, which include areas characterised by widespread human rights abuses and violations of national and international law. [Sustainability Report, 2017: waterdrop.cc & Sustainability Report 2018, 2019: waterdrop.cc] • Met: Based on OECD Guidance: As indicated above, the Company has abide by OECD Due Diligence Guidance for Responsible Supply Chain of Minerals from Conflict-Affected and High-Risk Areas. [Sustainability Report, 2017: waterdrop.cc & Sustainability Report 2018, 2019: waterdrop.cc) • Not met: Requires responsible mineral sourcing from suppliers: As indicated above "the Company and all its suppliers and outsourcers only purchase from smelting plants and refineries approved or certified by CFS, LBMA, or Responsible Jewelry Council". In addition "they do not purchase or support the use of any conflict minerals that directly or indirectly fund or support areas affected by armed conflicts, ensuring that all suppliers adopt responsible practices when purchasing mi
A.1.3.ICT.b	Commitment to respect human rights particularly	0	waterdrop.cc] The individual elements of the assessment are met or not as follows: Score 1 Not met: Women's Rights Not met: Children's Rights Not met: Migrant worker's rights Not met: Expecting suppliers to respect these rights

Indicator Code	Indicator name	Score (out of 2)	Explanation
	relevant to the		Score 2
	industry (ICT)		Not met: CEDAW/Women's Empowerment Principles
	, (, , , ,		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		The individual elements of the assessment are met or not as follows:
	engage with		Score 1
	stakeholders		Met: Commits to stakeholder engagement: The Company states that" BOE has
	Stakeriolaers		been listening to voices of all parties by establishing solid, close relationships with
			all stakeholders such as employees, customers, suppliers, governments, and
			communities. By doing so, it can have an understanding of expectations and
			demands of stakeholders, which is conducive to continuously improving its
			management and realizing the collaborative development and mutual benefit of
		1	BOE and its stakeholders" [Sustainability Report, 2017: waterdrop.cc &
			Sustainability Report 2018, 2019: waterdrop.cc
			• Met: Regular stakeholder engagement: For the past two years, the Company have
			had regular engagements with stakeholders. Main methods for communication and
			the contents are disclosed respectively for each stakeholder group. [Sustainability
			Report 2018, 2019: waterdrop.cc
			Score 2
			Not met: Commits to engage stakeholders in design
			Not met: Regular stakeholder design engagement
A.1.5	Commitment to		The individual elements of the assessment are met or not as follows:
	remedy		Score 1
	•		Not met: Commits to remedy
		0	Score 2
			Not met: Not obstructing access to other remedies
			Not met: Collaborating with other remedy initiatives
			Not met: Work with ICT suppliers to remedy impacts
A.1.6	Commitment to		The individual elements of the assessment are met or not as follows:
	respect the		Score 1
	rights of human	0	Not met: Zero tolerance attacks on HRs Defenders (HRDs)
	rights	-	Score 2
	defenders		Not met: Expects ICT suppliers to reflect company HRD commitments
	ucienuers		

A.2 Policy Commitments (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.2.1	Commitment		The individual elements of the assessment are met or not as follows:
	from the top		Score 1
		0	Not met: CEO or Board approves policy
		0	Not met: Board level responsibility for HRs
			Score 2
			Not met: Speeches/letters by Board members or CEO
A.2.2	Board		The individual elements of the assessment are met or not as follows:
	discussions		Score 1
		0	Not met: Board/Committee review of salient HRs
		0	Not met: Examples or trends re HR discussion
			Score 2
			Not met: Both examples and process
A.2.3	Incentives and		The individual elements of the assessment are met or not as follows:
	performance		Score 1
'	management	0	Not met: Incentives for at least one board member
		0	Not met: At least one key ICT HR risk, beyond employee H&S
			Score 2
			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		The individual elements of the assessment are met or not as follows:
	and resources		Score 1
	for day-to-day	0	Not met: Commits to ILO core conventions
	human rights		Not met: Senior responsibility for HR
	functions		Score 2
	Turictions		Not met: Day-to-day responsibility

Indicator Code	Indicator name	Score (out of 2)	Explanation
			Not met: Day-to-day responsibility for ICT in supply chain
B.1.2	Incentives and performance management	0	The individual elements of the assessment are met or not as follows: Score 1 Not met: Senior manager incentives for human rights Not met: At least one key ICT HR risk, beyond employee H&S
			Score 2 • Not met: Performance criteria made public
B.1.3	Integration with enterprise risk management	0	The individual elements of the assessment are met or not as follows: Score 1 Not met: HR risks is integrated as part of enterprise risk system: The Company states that "BOE has a strict internal control system. The Board of Directors and the Strategy Committee are responsible for risk management at Company level; the Board of Supervisors oversees risk management conducted by the Board of Directors; the permanent bodies of the Risk Control & Audit Committee under the Board of Directors are the risk control departments and internal control departments, and responsible for overseeing and evaluating risk management and reporting actions being taken to address major risks and the progress in doing so. "However, no further detail regarding human rights is mentioned. In addition, although the Sustainability Report 2018 states that the Company has identified some human rights risks as part of materiality assessment, there is no evidence that shows these issues have been integrated into the Company's internal control system. [Sustainability Report, 2017: waterdrop.cc & Sustainability Report 2018, 2019:
B.1.4.a	Communication /dissemination of policy commitment(s) within Company's own operations	0	The individual elements of the assessment are met or not as follows: Score 1 Not met: Commits to ILO core conventions Not met: Communicates its policy to all workers in own operations Score 2 Not met: Commits to all 4 ILO core conventions Not met: Communication of policy commitments to stakeholder Not met: How policy commitments are made accessible to audience
B.1.4.b	Communication /dissemination of policy commitment(s) to business relationships	0	The individual elements of the assessment are met or not as follows: Score 1 Not met: Commits to all 4 ILO core conventions for suppliers Not met: Communicating policy down the whole ICT supply chain: The Company states that that " it is an important step for BOE to fulfil its social responsibility in building a sustainable supply chain. BOE believes that a good corporate citizen cannot be alone but give full play to their own strength to drive upstream and downstream enterprises to jointly shoulder social responsibility, so as to boost the sustainable development of economy, environment and society" However, it is not clear how the company communicates its Human Rights policy. [Sustainability Report, 2017: waterdrop.cc & Sustainability Report 2018, 2019: waterdrop.cc] Not met: Requiring ICT suppliers to communicate policy down the chain Score 2 Not met: How HR commitments made binding/contractual Not met: Including on ICT suppliers
B.1.5	Training on Human Rights	0	The individual elements of the assessment are met or not as follows: Score 1 Not met: Scores at least 1 on A.1.2 Not met: Trains all workers on HR policy commitments: In those matters, the Company only states that "Well-targeted anti-corruption education was carried out according to the different requirements for different posts. Orientation training was conducted for new employees to enhance their integrity and professionalism. Personnel in key business fields and major projects were trained to be honest, dedicated, and compliant. Newly appointed managerial personnel were educated in integrity, honesty, professionalism and leadership through concrete cases. "No evidence found on human rights training for all. [Sustainability Report, 2017: waterdrop.cc & Sustainability Report 2018, 2019: waterdrop.cc] Not met: Trains relevant ICT managers including procurement Score 2 Not met: Score of 2 on A.1.2
B.1.6	Monitoring and corrective actions	0	The individual elements of the assessment are met or not as follows: Score 1 Not met: Scores at least 1 on A.1.2 Not met: Monitoring implementation of HR policy commitments

Indicator Code	Indicator name	Score (out of 2)	Explanation
			Not met: Monitoring ICT suppliers
			Score 2
			Not met: Score of 2 on A.1.2
			Not met: Describes corrective action process
			Not met: Example of corrective action
			Not met: Discloses % of ICT supply chain monitored
B.1.7	Engaging		The individual elements of the assessment are met or not as follows:
	business		Score 1
	relationships	0	Not met: HR affects ICT selection of suppliers
	relationships		Not met: HR affects on-going ICT supplier relationships
			Score 2
			Not met: Both requirement under score 1 met
			Not met: Working with ICT suppliers to improve performance
B.1.8	Approach to		The individual elements of the assessment are met or not as follows:
	engagement with potentially	0	Score 1
			Not met: Stakeholder process or systems
	affected		Not met: Frequency and triggers for engagement
			Not met: Workers in ICT SC engaged
	stakeholders		Not met: Communities in the ICT SC engaged
			Score 2
			Not met: Analysis of stakeholder views and company's actions on them

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.1	Identifying: Processes and triggers for identifying human rights risks and impacts	0	The individual elements of the assessment are met or not as follows: Score 1 Not met: Identifying risks in own operations: Although the Company has conducted materiality assessment, it is not clear if the Company considered the risks that are specific to locations or activities, covering the Company's operation. [Sustainability Report 2018, 2019: waterdrop.cc] Not met: Identifying risks in ICT suppliers: The Company states that "Suppliers shall ensure that the gold, tantalum, tungsten, and tin used or contained in their products and packages delivered to BOE are not from the "conflict minerals" from the areas controlled by any armed forces in the Democratic Republic of the Congo or its neighboring countries. " However, it is not clear what is the company's process to identify HR risks. [Sustainability Report, 2017: waterdrop.cc & Sustainability Report 2018, 2019: waterdrop.cc] Score 2 Not met: Ongoing global risk identification Not met: In consultation with HR experts Not met: Triggered by new circumstances
B.2.2	Assessing: Assessment of risks and impacts identified (salient risks and key industry risks)	0	The individual elements of the assessment are met or not as follows: Score 1 Not met: Salient risk assessment (and context) Not met: Public disclosure of salient risks Score 2 Not met: Both requirements under score 1 met
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 Not met: Action Plans to mitigate risks Not met: Including in ICT 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	0	The individual elements of the assessment are met or not as follows: Score 1 Not met: System to check if Actions are effective Not met: Lessons learnt from checking effectiveness Score 2 Not met: Both requirement under score 1 met

Indicator Code	Indicator name	Score (out of 2)	Explanation
	human rights risks and impacts		
B.2.5	Communicating: Accounting for how human rights impacts are addressed		The individual elements of the assessment are met or not as follows: Score 1 Not met: Comms plan re identifying risks Not met: Comms plan re assessing risks Not met: Comms plan re action plans for risks Not met: Comms plan re reviewing action plans Not met: Including ICT suppliers Score 2 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)/mec hanism(s) to receive complaints or concerns from workers	0.5	The individual elements of the assessment are met or not as follows: Score 1 Not met: Channel accessible to all workers: The Company states that "The Company has established effective complaint channels to prevent rights and interests of employees from damage and put an end to discrimination. Reports and complaints from employees can be delivered to "suggestion box" in written form or through employee representatives and investigated and handled by the professional department." However/ the Company does not make it clear if the channel is accessible to all workers. [Sustainability Report, 2017: waterdrop.cc & Sustainability Report 2018, 2019: waterdrop.cc] Score 2 Met: Number grievances filed, addressed or resolved: According to the CSR Report, the Company states that "There were no complaints about human rights and the use of child labor in 2017" [Sustainability Report, 2017: waterdrop.cc & Sustainability Report 2018, 2019: waterdrop.cc] Not met: Channel is available in all appropriate languages Not met: Expect ICT supplier to have equivalent grievance systems Not met: Opens own system to ICT supplier workers
C.2	Grievance channel(s)/mec hanism(s) to receive complaints or concerns from external individuals and communities	0	The individual elements of the assessment are met or not as follows: Score 1 • Not met: Grievance mechanism for community: According to the CSR report, the main methods of communications are "Information disclosure, Field trip and questionnaire survey, Public interest projects, Community volunteer activities" Grievance mechanisms are not mentioned. [Sustainability Report, 2017: waterdrop.cc & Sustainability Report 2018, 2019: waterdrop.cc] Score 2 • Not met: Describes accessibility and local languages • Not met: Expects ICT supplier to have community grievance systems • Not met: ICT supplier communities use global system
C.3	Users are involved in the design and performance of the channel(s)/mec hanism(s)	0	The individual elements of the assessment are met or not as follows: Score 1 Not met: Engages users to create or assess system Not met: Description of how they do this Score 2 Not met: Engages with users on system performance Not met: Provides user engagement example on performance Not met: ICT suppliers consult users in creation or assessment
C.4	Procedures related to the mechanism(s)/c hannel(s) are publicly available and explained	0	The individual elements of the assessment are met or not as follows: Score 1 Not met: Response timescales Not met: How complainants will be informed: The Company only states that " has established effective complaint channels to prevent rights and interests of employees from damage and put an end to discrimination. Reports and complaints from employees can be delivered to "suggestion box" in written form or through employee representatives and investigated and handled by the professional department." No evidence found on how complainants will be informed. [Sustainability Report, 2017: waterdrop.cc & Sustainability Report 2018, 2019: waterdrop.cc] Not met: Who is handling the complaint Score 2 Not met: Escalation to senior/independent level

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.5	Commitment to non-retaliation over complaints or concerns made	0	The individual elements of the assessment are met or not as follows: Score 1 Not met: Public statement prohibiting retaliation Not met: Practical measures to prevent retaliation Score 2 Not met: Has not retaliated in practice Not met: Expects ICT suppliers to prohibit retaliation
C.6	Company involvement with State- based judicial and non- judicial grievance mechanisms	0	The individual elements of the assessment are met or not as follows: Score 1 Not met: Won't impede state based mechanisms: Regarding the corruption matters, the Company only states that " The final document for penalty decision is issued by the Professional Ethics Disciplinary Committee of the Strategy Committee under the Board of Directors. The audit department regularly maintains and manages the blacklist and, by the approval, reports cases to the judicial organ and assists it in handling these cases." No further details were found in human rights area and not impeding access to state-based judicial or non-judicial mechanisms. Not met: Complainants not asked to waive rights Score 2 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 Not met: Describes how remedy has been provided Not met: Says how it would remedy key sector risks Score 2 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.4.1.a	Living wage (in own production or manufacturing operations)	0	The individual elements of the assessment are met or not as follows: Score 1 Not met: Living wage target timeframe Not met: Describes how living wage determined Score 2 Not met: Achieved payment of living wage: The Company only indicates that "Over the years, BOE has spared no efforts to safeguard rights and interests of employees, provide employees with competitive salary and benefits" [Sustainability Report, 2017: waterdrop.cc & Sustainability Report 2018, 2019: waterdrop.cc] Not met: Regularly review definition of living wage with unions
D.4.1.b	Living wage (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 Not met: Living wage in supplier code or contracts Not met: Improving living wage practices of suppliers Score 2 Not met: Both requirements under score 1 met Not met: Provide analysis of trends demonstrating progress
D.4.2	Aligning purchasing decisions with human rights	0	The individual elements of the assessment are met or not as follows: Score 1 Not met: Avoids business model pressure on HRs Not met: Positive incentives to respect human rights Score 2 Not met: Both requirements under score 1 met
D.4.3	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 product source: The Company only indicates that "Now, BOE has approximately 4,200 suppliers globally, of which there are over 2,300 suppliers specializing in BOM materials, outsourcing, and consumables, and about 1,900 suppliers of equipment and spare parts. They are mainly distributed in mainland China, South Korea, Japan and Taiwan province of China." Not clear if it identified and mapped them, including also indirect suppliers. [Sustainability Report, 2017: waterdrop.cc & Sustainability Report 2018, 2019: waterdrop.cc] Score 2 Not met: Discloses significant parts of supply chain and why

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.4.4.a	Prohibition on		The individual elements of the assessment are met or not as follows:
	child labour:		Score 1
	Age verification	0.5	• Met: Does not use child labour: The Company states that "The Company prohibits
	and corrective		the use of child laborers and eliminates forced labor" and "There were no complaints about human rights and the use of child laborer in 2017." [Sustainability
	actions (in own		Report, 2017: waterdrop.cc & Sustainability Report 2018, 2019: waterdrop.cc]
	production or		Not met: Age verification of job applicants and workers
	manufacturing		Score 2
	operations)		Not met: Remediation if children identified
D.4.4.b	Prohibition on		The individual elements of the assessment are met or not as follows:
	child labour:		Score 1
	Age verification		Not met: Child Labour rules in codes or contracts
	and corrective	0	Not met: How working with suppliers on child labour See 2
	actions (in the		Score 2 • Not met: Both requirements under score 1 met
	supply chain)		Not met: Both requirements under score I met Not met: Provide analysis of trends demonstrating progress
D.4.5.a	Prohibition on		The individual elements of the assessment are met or not as follows:
D. 1.3.d	forced labour:		Score 1
	Debt bondage		Not met: Pays workers in full and on time
	and other		Not met: Payslips show any legitimate deductions
	unacceptable		Score 2
	financial costs	0	Not met: How these practices are implemented and monitored for agencies,
	(in own		labour brokers or recruiters
	production or		
	manufacturing		
	operations)		
D.4.5.b	Prohibition on		The individual elements of the assessment are met or not as follows:
	forced labour:		Score 1
	Debt bondage		Not met: Debt and fees rules in codes or contracts
	and other		Not met: How working with suppliers on debt & fees
	unacceptable	0	Score 2
	financial costs		Not met: Both requirements under score 1 met
	(in the supply		Not met: Provide analysis of trends in progress made
	chain)		
D.4.5.c	Prohibition on		The individual elements of the assessment are met or not as follows:
	forced labour:	0	Score 1
	Restrictions on		Not met: Does not retain documents or restrict movement: The Company only
	workers (in		indicates that "The Company prohibits the use of child laborers and eliminates
	own production		forced labor. It forbids the use of violence, threats or unlawful restrictions on
	or		personal freedom to force employees to work and restrict the freedom of employees (jobs, resignations)".No evidence found in relation to worker mobility,
	manufacturing		including document retention. [Sustainability Report, 2017: waterdrop.cc &
	operations)		Sustainability Report 2018, 2019: waterdrop.cc]
			Score 2
			Not met: How sure about agencies or brokers
D.4.5.d	Prohibition on		The individual elements of the assessment are met or not as follows:
	forced labour:		Score 1
	Restrictions on	0	Not met: Free movement rules in codes or contracts Not met: How these greatises are included and an existence for a consistence of the contracts.
	workers (in the		Not met: How these practices are implemented and monitored for agencies, labour brokers or recruiters
	supply chain)		Score 2
			Not met: Both requirements under score 1 met
			Not met: Provide analysis of trends in progress made
D.4.6.a	Freedom of		The individual elements of the assessment are met or not as follows:
	association and		Score 1
	collective		Not met: Commits not to interfere with union rights and collective bargaining and
	bargaining (in		prohibits intimidation and retaliation
	own production		• Met: Discloses % covered by collective bargaining: Although the Company
	or		indicates that "The rate of employees joining trade unions, and the proportion of employees signing the collective negotiation agreement are all 100%" it does not
	manufacturing		discloses the percentage of its workforce whose terms and conditions of work are
	operations)		covered by collective bargaining agreements. [Sustainability Report, 2017:
	,		<u>waterdrop.cc</u> & Sustainability Report 2018, 2019: <u>waterdrop.cc</u>]
			Score 2
			Not met: Both requirement under score 1 met

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.4.6.b	Freedom of		The individual elements of the assessment are met or not as follows:
	association and		Score 1
	collective		Not met: FoA & CB rules in codes or contracts
	bargaining (in	0	Not met: How working with suppliers on FoA and CB
	the supply		Score 2
	chain)		Not met: Both requirements under score 1 met
5.4.	,		Not met: Provide analysis of trends in progress made
D.4.7.a	Health and		The individual elements of the assessment are met or not as follows:
	safety:		Score 1
	Fatalities, lost		Not met: Injury Rate disclosures Not met: Lest days or pear miss disclosure.
	days, injury	0	Not met: Lost days or near miss disclosure Not met: Fatalities disclosures
	rates (in own		Not met: Patalities disclosures Not met: Occupational disease rates
	production of		Score 2
	manufacturing		Not met: Set targets for H&S performance
	operations)		Not met: Met targets or explains why not
D.4.7.b	Health and		The individual elements of the assessment are met or not as follows:
21	safety:		Score 1
	Fatalities, lost		Not met: Sets out clear Health and Safety requirements
			Not met: Injury rate disclosures
	days, injury	0	Not met: Lost days or near miss disclosures
	rates (in the	0	Not met: Fatalities disclosures
	supply chain)		Not met: Occupational disease rates
			Score 2
			Not met: How working with suppliers on H&S
			Not met: Provide analysis of trends in progress made
D.4.8.a	Women's rights		The individual elements of the assessment are met or not as follows:
	(in own		Score 1
	production or	0	Not met: Process to stop harassment and violence: The Company indicates that
	manufacturing operations)		"The Company has given high priority to equal rights for men and women and
			resolutely put an end to discrimination against women in employment, with the
			proportion of female employees and managers increasing steadily" However, it
			does not describe its process to prohibit harassment and violence against women.
			Not met: Working conditions take account of gender Not met: Equality of opportunity at all levels: The Company indicates that "The
			Company has given high priority to equal rights for men and women and resolutely
			put an end to discrimination against women in employment, with the proportion of
			female employees and managers increasing steadily" However, it does not describe
			how it provides the equality of opportunity at all levels.
			Score 2
			Not met: Meets all of the requirements under score 1
D.4.8.b	Women's rights		The individual elements of the assessment are met or not as follows:
	(in the supply		Score 1
	chain)		Not met: Women's rights in codes or contracts
	Chamy	0	Not met: How working with suppliers on women's rights
			Score 2
			Not met: Both requirement under score 1 met
			Not met: Provide analysis of trends in progress made
D.4.9.a	Working hours		The individual elements of the assessment are met or not as follows:
	(in own		Score 1
	production or	0	Not met: Respects max hours, min breaks and rest periods in its own operations
	manufacturing		Score 2
	operations)		Not met: How it implements and checks this
D.4.9.b	Working hours		The individual elements of the assessment are met or not as follows:
D.4.5.0	(in the supply	0	Score 1
	chain)		Not met: Working hours in codes or contracts
			Not met: How working with suppliers on working hours
			Score 2
			Not met: Both requirements under score 1 met
			Not met: Provide analysis of trends in progress made

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.4.10.a	Responsible		The individual elements of the assessment are met or not as follows:
	Mineral		Score 1
	Sourcing:		Not met: Responsible mineral sourcing due diligence in suppler contracts: The Company indicates that "In the implementation of raw material procurement
	Arrangements		policies, BOE has abided by OECD Due Diligence Guidance for Responsible Supply
	with Suppliers		Chains of Minerals from Conflict-Affected and High-Risk Areas prepared by CFSI,
	and (p. f.		the UN and OECD. The Company and all its suppliers and outsourcers only purchase
	Smelters/Refin	0	from smelting plants and refineries approved or certified by CFS." However, there is
	ers in the Mineral		no evidence that the Company incorporating this evidence into the contracts or agreements. [Sustainability Report, 2017: waterdrop.cc & Sustainability Report
	Resource		2018, 2019: waterdrop.cc]
	Supply Chains		Not met: Builds capacity with smelters/refiners
	Cappi, Citamic		Score 2
			Not met: Disclosure of smelter information in supplier requirements
D 4 10 b	Dosponsible		Not met: Responsible conflict mineral sourcing covers all minerals The individual elements of the assessment are met or not as follows:
D.4.10.b	Responsible Mineral		Score 1
			Not met: Risk identification and disclosure in line with OECD Guidance
	Sourcing: Risk Identification in		Not met: Identification of smelter/refiners and OECD due diligence: The Company
	Mineral Supply		states that "it uses CFSI-CMRT annually to conduct conflict minerals surveys
	Chain		throughout the supply chain. In 2017, BOE conducted investigations on 89 suppliers
			of resistors, inductors, capacitors, IC, LED, and connectors that may contain gold, tantalum, tungsten and tin, and all supplier offered feedbacks". The investigation
			results showed that gold, tantalum, tungsten and tin in BOE's raw materials come
		0	from 194 smelters, which meet CFSI's requirements and BOE's supply standard."
		U	However, no evidence found on how the company assessed and determined that
			those smelters carried out due diligence processes covered by the OECD Guidance.
			[Sustainability Report, 2017: <u>waterdrop.cc</u> & Sustainability Report 2018, 2019: <u>waterdrop.cc</u>]
			Score 2
			Not met: Discloses smelters/refiners judged in line with OECD due diligence: No
			evidence found of lists of smelters/refiners considered to be conformant with to
			the due diligence processes covered by the OECD Guidance. [Sustainability Report,
			2017: <u>waterdrop.cc</u> & Sustainability Report 2018, 2019: <u>waterdrop.cc</u>] • Not met: Responsible conflict mineral sourcing covers all minerals
D.4.10.c	Responsible		The individual elements of the assessment are met or not as follows:
D.4.10.C	Mineral		Score 1
	Sourcing: Risk		Not met: Describes mineral risk management plan for supply chain: In its CSR
	Management in		report the Company states that "BOE uses CFSI-CMRT annually to conduct conflict
	the Mineral		minerals surveys throughout the supply chain. In 2017, BOE conducted
	Supply Chain		investigations on 89 suppliers of resistors, inductors, capacitors, IC, LED, and connectors that may contain gold, tantalum, tungsten and tin, and all supplier
			offered feedbacks. The investigation results showed that gold, tantalum, tungsten
			and tin in BOE's raw materials come from 194 smelters, which meet CFSI's
			requirements and BOE's supply standard." However, he Company does not
			discloses a summary of the risk management plan. However, it is not clear the steps the company takes to manage and respond to risks in its mineral supply
			chain. [Sustainability Report, 2017: waterdrop.cc & Sustainability Report 2018,
			2019: waterdrop.cc]
			Not met: Monitoring, tracking and whether better risk prevention/mitigation over
		_	time [Sustainability Report, 2017: <u>waterdrop.cc</u> & Sustainability Report, 2017:
		0	waterdrop.cc]
			Score 2 • Not met: Supplier and stakeholders engaged in risk management strategy: The
			Company states that "Suppliers shall ensure that the gold, tantalum, tungsten, and
			tin used or contained in their products and packages delivered to BOE are not from
			the "conflict minerals" from the areas controlled by any armed forces in the
			Democratic Republic of the Congo or its neighboring countries. Suppliers shall
			formulate their own policies on conflict minerals in accordance with OECD requirements on due diligence, and convey the policies to next-level suppliers.
			Suppliers shall investigate their supply chain in detail, identify and trace the sources
			of gold, tantalum, tungsten, and tin, ensure the legitimacy of the source of raw
			materials, and truthfully fill in and submit the CMRT questionnaire or other
			document." However, the Company should include evidence of consultation with
			suppliers and stakeholders about the approach to follow, not just indicating which
			are the requirements for suppliers. [Sustainability Report, 2017: waterdrop.cc & Sustainability Report 2018, 2019: waterdrop.cc]
			Not met: Responsible conflict mineral sourcing covers all minerals
	<u> </u>	<u> </u>	

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
E(1).0	Serious		No allegations meeting the CHRB severity threshold were found, and so the score
	allegation No 1		of 4.25 out of 80 points scored in themes A-D & F has been applied to produce a
			score of 1.06 out of 20 points for theme E.

F. Transparency (10% of Total)

Indicator Code	Indicator name	Score	Explanation
F.1	Company willingness to publish information	0.46 out of 4	Out of a total of 52 indicators assessed under sections A-D of the benchmark, BOE Technology Group made data public that met one or more elements of the methodology in 6 cases, leading to a disclosure score of 0.46 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 • Met: Company reports on GRI: The Company reports on GRI in its CSR report. [Sustainability Report, 2017: waterdrop.cc & Sustainability Report 2018, 2019: waterdrop.cc] • Not met: Company reports on SASB • Not met: Company reports on UNGPRF
F.3	Key, High Quality Disclosures	0 out of 4	BOE Technology Group 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 Not met: Score 2 for A.2.2: Board discussions Not met: Score 2 for B.1.6: Monitoring and corrective actions Not met: Score 2 for C.1: Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers Not met: Score 2 for C.3: Users are involved in the design and performance of the channel(s)/mechanism(s) Discussing challenges openly Not met: Score 2 for B.2.4: Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts Not met: Score 2 for C.7: Remedying adverse impacts and incorporating lessons learned Demonstrating a forward focus Not met: Score 2 for A.2.3: Incentives and performance management Not met: Score 1 for D.4.1.a: Living wage (in own production or manufacturing operations) Not met: Score 2 for D.4.7.a: Health and safety: Fatalities, lost days, injury rates (in own production of manufacturing 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 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.