## Detailed assessment

### A. Governance and Policies (10% of Total)

#### A.1 Policy Commitments (5% of Total)

<table>
<thead>
<tr>
<th>Indicator Code</th>
<th>Indicator name</th>
<th>Score (out of 2)</th>
<th>Explanation</th>
</tr>
</thead>
<tbody>
<tr>
<td>A.1.1</td>
<td>Commitment to respect human rights</td>
<td>1</td>
<td>The individual elements of the assessment are met or not as follows:</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Score 1</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>• Met: General HRs commitment: The Company states &quot;our commitment to human rights is embodied throughout the companies policies and statements&quot;.</td>
</tr>
<tr>
<td></td>
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<td></td>
<td>Also, on its Annual Report the Company also states that 'Our Global Human Rights Statement defines our commitment to respecting the fundamental human rights inherent to all people. We share our policies and practices with suppliers'.</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>• Not met: UDHR</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>• Not met: International Bill of Rights</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Score 2</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>• Not met: UNGCs</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>• Not met: OECD</td>
</tr>
<tr>
<td>A.1.2</td>
<td>Commitment to respect the human rights of workers</td>
<td>0.5</td>
<td>The individual elements of the assessment are met or not as follows:</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Score 1</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>• Met: UNGC principles 1 &amp; 2: We are also a signatory to the UN Global Compact concerning human rights, labor practices, environmental stewardship, and anti-corruption.</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>(Our Strategy, 2019: brown-forman.com)]</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>• Not met: UDHR</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>• Not met: International Bill of Rights</td>
</tr>
<tr>
<td></td>
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<td></td>
<td>Score 2</td>
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<tr>
<td></td>
<td></td>
<td></td>
<td>• Not met: UNGPs</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>• Not met: OECD</td>
</tr>
</tbody>
</table>
### A.1.3 AG.a Commitment to respect human rights particularly relevant to the industry - land and natural resources (AG)

<table>
<thead>
<tr>
<th>Indicator Code</th>
<th>Indicator name</th>
<th>Score (out of 2)</th>
<th>Explanation</th>
</tr>
</thead>
</table>
|                |                | 0               | The individual elements of the assessment are met or not as follows: Score 1  
|                |                |                |   • Not met: Respect land ownership and natural resources  
|                |                |                |   • Not met: Respecting the right to water: Although the Company discloses that 'Water is an essential component of our products, so the quality and quantity of available water is important to our ability to operate our business', there isn't a description about a commitment to respect the human rights to water. [Corporate Responsibility report, 2019: brown-forman.com]  
|                |                |                |   • Not met: Expecting suppliers to respect these rights  
|                |                | 2               | Score 2  
|                |                |                |   • Not met: Voluntary Guidelines on Tenure Rights  
|                |                |                |   • Not met: IFC Performance Standards  
|                |                |                |   • Not met: FPIC for all  
|                |                |                |   • Not met: Zero tolerance for land grabs  
|                |                |                |   • Not met: Respecting the right to water  
|                |                |                |   • Not met: Expecting suppliers to respect these rights |

### A.1.3 AG.b Commitment to respect human rights particularly relevant to the industry - people’s rights (AG)

<table>
<thead>
<tr>
<th>Indicator Code</th>
<th>Indicator name</th>
<th>Score (out of 2)</th>
<th>Explanation</th>
</tr>
</thead>
</table>
|                |                | 0               | The individual elements of the assessment are met or not as follows: Score 1  
|                |                |                |   • Not met: Women’s rights: The Company states that it hires and promotes based on skills and abilities while seeking a balanced representation of women and minorities at all levels. However, it is not sufficient as evidence for this indicator. [Diversity Principles, Goals & Objectives, 17/03/2019: static.brown-forman.com]  
|                |                |                |   • Not met: Children’s rights  
|                |                |                |   • Not met: Migrant worker’s rights  
|                |                |                |   • Not met: Expects suppliers to respect these rights: The Company has established Supplier diversity as an extension of its diversity philosophy. However the diversity philosophy is not sufficient as evidence for this indicator. [Supplier Diversity, 17/03/2019: brown-forman.com & Diversity Principles, Goals & Objectives, 17/03/2019: static.brown-forman.com]  
|                |                | 2               | Score 2  
|                |                |                |   • 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 engage with stakeholders

<table>
<thead>
<tr>
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<th>Score (out of 2)</th>
<th>Explanation</th>
</tr>
</thead>
</table>
|                |                | 0               | The individual elements of the assessment are met or not as follows: Score 1  
|                |                |                |   • Not met: Commits to stakeholder engagement: The Company states that it will communicate with and educate employees. However it is not sufficient as evidence for this indicator. [Company website, 17/03/2019: brown-forman.com]  
|                |                |                |   • Not met: Regular stakeholder engagement  
|                |                | 2               | Score 2  
|                |                |                |   • Not met: Commits to engage stakeholders in design  
|                |                |                |   • Not met: Regular stakeholder design engagement |
### A.1.5 Commitment to remedy

- **Score:** 0
- **Explanation:**
  - The individual elements of the assessment are met or not as follows:
    - **Score 1:**
      - **Not met:** Commit to remedy: The Company states that it will develop corrective action plans if deviations are found. However, it is not sufficient as evidence for this indicator. ([Global Human Rights Statement, 17/03/2019: static.brown-forman.com](static.brown-forman.com))
    - **Score 2:**
      - **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

- **Score:** 0
- **Explanation:**
  - The individual elements of the assessment are met or not as follows:
    - **Score 1:**
      - **Not met:** Zero tolerance attacks on HRs Defenders (HRDs)
    - **Score 2:**
      - **Not met:** Expects AG suppliers to reflect company HRD commitments

### A.2 Policy Commitments (5% of Total)

#### A.2.1 Commitment from the top

- **Score:** 0
- **Explanation:**
  - The individual elements of the assessment are met or not as follows:
    - **Score 1:**
      - **Not met:** CEO or Board approves policy: The Company posted Modern Slavery Act Statement on its website. However, only two subsidiaries of the Company are committed to the statement, therefore, it is not sufficient as evidence for Brown-Forman Corporation. ([Modern Slavery Act Statement, 17/03/2019: static.brown-forman.com](static.brown-forman.com))
      - **Not met:** Board level responsibility for HRs
    - **Score 2:**
      - **Not met:** Speeches/letters by Board members or CEO

#### A.2.2 Board discussions

- **Score:** 0
- **Explanation:**
  - The individual elements of the assessment are met or not as follows:
    - **Score 1:**
      - **Not met:** Board/Committee review of salient HRs
      - **Not met:** Examples or trends re HR discussion
    - **Score 2:**
      - **Not met:** Both examples and process

#### A.2.3 Incentives and performance management

- **Score:** 0
- **Explanation:**
  - The individual elements of the assessment are met or not as follows:
    - **Score 1:**
      - **Not met:** Incentives for at least one board member
      - **Not met:** At least one key AG 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)

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

- **Score:** 0
- **Explanation:**
  - The individual elements of the assessment are met or not as follows:
    - **Score 1:**
      - **Not met:** Commits to ILO core conventions: See indicator A.1.2
      - **Not met:** Senior responsibility for HRs
    - **Score 2:**
      - **Not met:** Day-to-day responsibility
      - **Not met:** Day-to-day responsibility for AG in supply chain

#### B.1.2 Incentives and performance management

- **Score:** 0
- **Explanation:**
  - 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 AG HR risk, beyond employee H&S
    - **Score 2:**
      - **Not met:** Performance criteria made public

#### B.1.3 Integration with enterprise risk management

- **Score:** 0
- **Explanation:**
  - 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
    - **Score 2:**
      - **Not met:** Audit Ctte or independent risk assessment

#### B.1.4.a Communication/dissemination of policy

- **Score:** 0
- **Explanation:**
  - The individual elements of the assessment are met or not as follows:
    - **Score 1:**
      - **Not met:** Commits to ILO core conventions
<table>
<thead>
<tr>
<th>Indicator Code</th>
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<th>Score (out of 2)</th>
<th>Explanation</th>
</tr>
</thead>
<tbody>
<tr>
<td>commitment(s) within Company's own operations</td>
<td>0</td>
<td>- Not met: Communicates its policy to all workers in own operations: The Company states that it recognizes the need to ensure that the guidelines in its Human rights statement are practiced throughout its operations. To do this, it will communicate with and educate employees; monitor and evaluate the level of compliance through self-assessments, on-site audits, employee surveys. However, it is not clear how this communication will take place or if it will be translated in different languages, for example. [Global Human Rights Statement, 17/03/2019: static.brown-forman.com] 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</td>
<td></td>
</tr>
<tr>
<td>B.1.4.b Communication/dissemination of policy commitment(s) to business relationships</td>
<td>0</td>
<td>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 AG supply chain: The Company states that it shares its human rights policies and practices with its suppliers through its Supplier Guiding Principles on Human Rights. However, we could no identify evidence for the approach the company uses to communicate this policy. [Supplier Guiding Principles with respect to Human Rights, 17/03/2019: static.brown-forman.com] - Not met: Requiring AG suppliers to communicate policy down the chain: The Company states that it asks its business partners to conduct their operations consistent with the principles of the United Nations Universal Declaration of Human Rights. However, it is not clear how they communicate it to their supplier. [Supplier Guiding Principles with respect to Human Rights, 17/03/2019: static.brown-forman.com] Score 2 - Not met: How HR commitments made binding/contractual - Not met: Including on AG suppliers</td>
<td></td>
</tr>
<tr>
<td>B.1.5 Training on Human Rights</td>
<td>0</td>
<td>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: The Company states that it will communicate and educate employees. However it is not sufficient to award this indicator. [Global Human Rights Statement, 17/03/2019: static.brown-forman.com] - Not met: Trains relevant AG managers including procurement Score 2 - Not met: Score of 2 on A.1.2 - Not met: Both requirements under score 1 met</td>
<td></td>
</tr>
<tr>
<td>B.1.6 Monitoring and corrective actions</td>
<td>0</td>
<td>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: The Company states that it will monitor and evaluate the level of compliance through self-assessments, on-site audits, employee surveys, and develop corrective action plans if deviations are found. To award this indicator, the Company needs to provide evidence of actual monitoring activities. [Global Human Rights Statement, 17/03/2019: static.brown-forman.com] - Not met: Monitoring AG 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 AG supply chain monitored</td>
<td></td>
</tr>
<tr>
<td>B.1.7 Engaging business relationships</td>
<td>0</td>
<td>The individual elements of the assessment are met or not as follows: Score 1 - Not met: HR affects AG selection of suppliers - Not met: HR affects on-going AG supplier relationships Score 2 - Not met: Both requirement under score 1 met - Not met: Working with AG suppliers to improve performance</td>
<td></td>
</tr>
<tr>
<td>B.1.8 Approach to engagement with potentially</td>
<td>0</td>
<td>The individual elements of the assessment are met or not as follows: Score 1 - Not met: Stakeholder process or systems - Not met: Frequency and triggers for engagement - Not met: Workers in AG SC engaged</td>
<td></td>
</tr>
<tr>
<td>Indicator Code</td>
<td>Indicator name</td>
<td>Score (out of 2)</td>
<td>Explanation</td>
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</tbody>
</table>
| affected stakeholders | | | • Not met: Communities in the AG 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)

<table>
<thead>
<tr>
<th>Indicator Code</th>
<th>Indicator name</th>
<th>Score (out of 2)</th>
<th>Explanation</th>
</tr>
</thead>
</table>
| 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  
• Not met: Identifying risks in AG suppliers  
Score 2  
• Not met: Ongoing global risk identification  
• Not met: In consultation with stakeholders  
• Not met: In consultation with HR experts  
• Not met: Triggered by new circumstances  
• Not met: Explains use of HRIAs or ESIA (inc HR) |
| B.2.2 | Assessing: Assessment of risks and impacts identified (salient risks and key industry risks) | 0 | 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 AG supply chain  
• Not met: Example of Actions decided: The Company discloses that ‘reduced the amount of repetitive motion by our employees, which mitigates injuries’. However it is not clear what is the company’s plan to mitigate the salient HR risks [Corporate Responsibility report, 2019: brown-forman.com]  
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 | 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 |
| B.2.5 | Communicating: Accounting for how human rights impacts are addressed | 0 | The individual elements of the assessment are met or not as follows:  
Score 1  
• 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 AG 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)

<table>
<thead>
<tr>
<th>Indicator Code</th>
<th>Indicator name</th>
<th>Score (out of 2)</th>
<th>Explanation</th>
</tr>
</thead>
</table>
| C.1 | Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers | 1 | The individual elements of the assessment are met or not as follows:  
Score 1  
• Met: Channel accessible to all workers: The Company operates anonymous compliance hotline and online reporting channel for employees. It also runs the international toll-free service number for international employees. [Global Human Rights Statement, 17/03/2019: static.brown-forman.com]  
Score 2  
• Not met: Number grievances filed, addressed or resolved  
• Not met: Channel is available in all appropriate languages |
<table>
<thead>
<tr>
<th>Indicator Code</th>
<th>Indicator name</th>
<th>Score (out of 2)</th>
<th>Explanation</th>
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</thead>
</table>
| C.2           | Grievance channel(s)/mechanism(s) to receive complaints or concerns from external individuals and communities | 0                | The individual elements of the assessment are met or not as follows:  
Score 1  
- Not met: Expect AG supplier to have equivalent grievance systems  
- Not met: Opens own system to AG supplier workers  
Score 2  
- Not met: Grievance mechanism for community  
- Not met: Describes accessibility and local languages  
- Not met: Expects AG supplier to have community grievance systems  
- 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                | 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: AG suppliers consult users in creation or assessment |
| C.4           | Procedures related to the mechanism(s)/channel(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  
Score 2  
- Not met: Escalation to senior/independent level |
| C.5           | Commitment to non-retaliation over complaints or concerns made                  | 0.5              | The individual elements of the assessment are met or not as follows:  
Score 1  
- Not met: Public statement prohibiting retaliation  
Score 2  
- Not met: Has not retaliated in practice  
- Not met: AG suppliers consult users 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  
- 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           | Remedy 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)**

<table>
<thead>
<tr>
<th>Indicator Code</th>
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<th>Score (out of 2)</th>
<th>Explanation</th>
</tr>
</thead>
</table>
| 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  
- Not met: Living wage in supplier code or contracts: Although the Company states about fair wages and working hours in Supplier guiding principles with respect to Human rights and asks its business partners to conduct their operations consistent with the principles of the UN Universal Declaration of Human Rights, it is not sufficient as evidence for this indicator. [Supplier Guiding Principles with respect to Human Rights, 17/03/2019: static.brown-forman.com]  
- Not met: Improving living wage practices of suppliers  
Score 2  
- Not met: Both requirements under score 1 met |
<table>
<thead>
<tr>
<th>Indicator Code</th>
<th>Indicator name</th>
<th>Score (out of 2)</th>
<th>Explanation</th>
</tr>
</thead>
<tbody>
<tr>
<td>D.1.2</td>
<td>Aligning purchasing decisions with human rights</td>
<td>0</td>
<td>The individual elements of the assessment are met or not as follows: Score 1 • Not met: Provides analysis of trends demonstrating progress</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>• Not met: Avoids business model pressure on HRs (purchasing practices) • Not met: Positive incentives to respect human rights (purchasing practices) Score 2 • Not met: Both requirements under score 1 met</td>
</tr>
<tr>
<td>D.1.3</td>
<td>Mapping and disclosing the supply chain</td>
<td>0</td>
<td>The individual elements of the assessment are met or not as follows: Score 1 • Not met: Provides analysis of trends demonstrating progress</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>• Not met: Provides analysis of trends demonstrating progress</td>
</tr>
<tr>
<td>D.1.4.b</td>
<td>Prohibition on child labour: Age verification and corrective actions (in the supply chain)</td>
<td>0</td>
<td>The individual elements of the assessment are met or not as follows: Score 1 • Not met: Child Labour rules in codes or contracts: The Company states that supplier should not permit any form of exploitative child labour. In those situations where minors may be employed, it will act to assure that such employment is legal and will not lead to a child losing his or her educational opportunities. However we found no evidence of requirements for age verification and remediation programmes. [Supplier Guiding Principles with respect to Human Rights, 17/03/2019: static.brown-forman.com] • Not met: Both requirements under score 1 met</td>
</tr>
<tr>
<td>D.1.5.b</td>
<td>Prohibition on forced labour: Debt bondage and other unacceptable financial costs (in the supply chain)</td>
<td>0</td>
<td>The individual elements of the assessment are met or not as follows: Score 1 • Not met: Debt and fees rules in codes or contracts: The Company states that supplier should not permit any form of exploitative child labour. In those situations where minors may be employed, it will act to assure that such employment is legal and will not lead to a child losing his or her educational opportunities. However we found no evidence of requirements for age verification and remediation programmes. [Supplier Guiding Principles with respect to Human Rights, 17/03/2019: static.brown-forman.com] • Not met: How working with suppliers on child labour Score 2 • Not met: Both requirements under score 1 met</td>
</tr>
<tr>
<td>D.1.5.d</td>
<td>Prohibition on forced labour: Restrictions on workers (in the supply chain)</td>
<td>0</td>
<td>The individual elements of the assessment are met or not as follows: Score 1 • Not met: Free movement rules in codes or contracts: The Company states that supplier should not permit any form of exploitative child labour. In those situations where minors may be employed, it will act to assure that such employment is legal and will not lead to a child losing his or her educational opportunities. However we found no evidence of requirements for age verification and remediation programmes. [Supplier Guiding Principles with respect to Human Rights, 17/03/2019: static.brown-forman.com] • Not met: Both requirements under score 1 met</td>
</tr>
<tr>
<td>D.1.6.b</td>
<td>Freedom of association and collective bargaining (in the supply chain)</td>
<td>1</td>
<td>The individual elements of the assessment are met or not as follows: Score 1 • Met: FoA &amp; CB rules in codes or contracts: The Company expects its suppliers to recognize the legal rights of employees to choose or not choose to form and join legally recognized trade (collective bargaining) unions. Employees who choose or not choose to form and/or join trade unions or other organizations shall not be discriminated against or harassed on account of lawful activities. [Supplier Guiding Principles with respect to Human Rights, 17/03/2019: static.brown-forman.com] • Not met: How working with suppliers on FoA and CB Score 2 • Not met: Both requirements under score 1 met</td>
</tr>
<tr>
<td>D.1.7.b</td>
<td>Health and safety: Fatalities, lost days, injury rates (in the supply chain)</td>
<td>0.5</td>
<td>The individual elements of the assessment are met or not as follows: Score 1 • Met: Sets out clear Health and Safety requirements: The Company expects its suppliers to comply with all laws related to workplace safety. Where national / local laws do not exist then responsible international standards are to be applied. [Supplier Guiding Principles with respect to Human Rights, 17/03/2019: static.brown-forman.com] • Not met: How working with suppliers on H&amp;S Score 2 • Not met: Provides analysis of trends demonstrating progress</td>
</tr>
<tr>
<td>Indicator Code</td>
<td>Indicator name</td>
<td>Score (out of 2)</td>
<td>Explanation</td>
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</tr>
<tr>
<td>D.1.8.b</td>
<td>Land rights: Land acquisition (in the supply chain)</td>
<td>0</td>
<td>The individual elements of the assessment are met or not as follows: Score 1 • Not met: Rules on land &amp; owners in codes or contracts • Not met: How working with suppliers on land issues Score 2 • Not met: Both requirements under score 1 met • Not met: Provides analysis of trends demonstrating progress</td>
</tr>
<tr>
<td>D.1.9.b</td>
<td>Water and sanitation (in the supply chain)</td>
<td>0</td>
<td>The individual elements of the assessment are met or not as follows: Score 1 • Not met: Rules on water stewardship in codes or contracts • Not met: How working with suppliers on water stewardship issues Score 2 • Not met: Both requirements under score 1 met • Not met: Provides analysis of trends demonstrating progress</td>
</tr>
<tr>
<td>D.1.10.b</td>
<td>Women's rights (in the supply chain)</td>
<td>0</td>
<td>The individual elements of the assessment are met or not as follows: Score 1 • Not met: Women's rights in codes or contracts • Not met: How working with suppliers on women's rights Score 2 • Not met: Both requirements under score 1 met • Not met: Provides analysis of trends demonstrating progress</td>
</tr>
</tbody>
</table>

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

<table>
<thead>
<tr>
<th>Indicator Code</th>
<th>Indicator name</th>
<th>Score (out of 2)</th>
<th>Explanation</th>
</tr>
</thead>
<tbody>
<tr>
<td>E(1).0</td>
<td>Serious allegation No 1</td>
<td>No allegations meeting the CHRB severity threshold were found, and so the score of 6.10 out of 80 points scored in themes A-D &amp; F has been applied to produce a score of 1.53 out of 20 points for theme E.</td>
<td></td>
</tr>
</tbody>
</table>

**F. Transparency (10% of Total)**

<table>
<thead>
<tr>
<th>Indicator Code</th>
<th>Indicator name</th>
<th>Score</th>
<th>Explanation</th>
</tr>
</thead>
<tbody>
<tr>
<td>F.1</td>
<td>Company willingness to publish information</td>
<td>0.57 out of 4</td>
<td>Out of a total of 42 indicators assessed under sections A-D of the benchmark, Brown-Forman Corporation made data public that met one or more elements of the methodology in 6 cases, leading to a disclosure score of 0.57 out of 4 points.</td>
</tr>
<tr>
<td>F.2</td>
<td>Recognised Reporting Initiatives</td>
<td>2 out of 2</td>
<td>The individual elements of the assessment are met or not as follows: Score 2 • Met: Company reports on GRI: The company report against GRI. [GRI INDEX: <a href="https://static.brown-forman.com/wp-content/uploads/2019/06/25164020/GRI-Content-Index-BF-FY2019-Remediated-6-18-19-FINAL.pdf#static.brown-forman.com">https://static.brown-forman.com/wp-content/uploads/2019/06/25164020/GRI-Content-Index-BF-FY2019-Remediated-6-18-19-FINAL.pdf#static.brown-forman.com</a>]</td>
</tr>
<tr>
<td>F.3</td>
<td>Key, High Quality Disclosures</td>
<td>0 out of 4</td>
<td>Brown-Forman Corporation 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 • 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 : Remediying 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 2 for B.1.2 : Incentives and performance management</td>
</tr>
</tbody>
</table>

**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 snapshot 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.