

Company Name Burberry
Industry Apparel (Supply Chain only)
Overall Score (*) 45.3 out of 100

Theme Score	Out of	For Theme
4.8	10	A. Governance and Policies
14.0	25	B. Embedding Respect and Human Rights Due Diligence
4.2	15	C. Remedies and Grievance Mechanisms
5.0	20	D. Performance: Company Human Rights Practices
15.0	20	E. Performance: Responses to Serious Allegations
2.4	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	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Met: General HRs commitment: The Company states in its Humans Rights Policy that is committed to respecting and safeguarding the human rights of all the people whose lives are directly or indirectly impacted by Burberry. [Human Rights Policy, 30/08/2017: burberryplc.com] Met: UNGC principles 1 & 2: The Company is a signatory of the UN Global Compact and have committed to respecting its 10 responsible business principles. Score 2 <ul style="list-style-type: none"> Met: UNGPs: Burberry states in its Human Rights report that is committed to respecting and upholding the UN Guiding Principles on Business and Human Rights. [Human Rights Policy, 2019, 3/18/2019: burberryplc.com]
A.1.2	Commitment to respect the human rights of workers	2	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Met: UNGC principles 3-6: The Company has a report called 'UN Global Compact communication', in which it describes how implement all the ten UNGC principles and explicitly states that they follow all the principles: "Burberry is a signatory of the UN Global Compact since 2008, and we continue to use the UN Global Compact's Ten principles to guide our business activity". [UN Global Compact - Communication] Met: Explicitly list ALL four ILO for AP suppliers: On its Modern Slavery & Transparency Supply Chain report, the Company says that all the suppliers and business partners must follow the Burberry's responsible business principles, also named as 'Ethical Trading Code of Conduct', which describes each of the ILO core

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>labor standards. With respect freedom of association and collective bargaining, the Code also establishes alternative measures when these rights are restricted by law: 'Where the right to freedom of association and collective bargaining is restricted under law, the employer facilitates, and does not hinder, the development of parallel means for independent and free association and bargaining.' [Burberry Modern Slavery & Transparency in Supply Chain, 2017/18: burberryplc.com & Ethical Trading Code of Conduct, 12/05/2017: burberryplc.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Met: Explicit commitment to All four ILO Core: On its Ethical Trading Code of Conduct, the Company has its own statements which includes the 4 ILO fundamental rights at work. It says that: "Workers, without distinction, have the right to join or form trade unions of their own choice and to bargain collectively"; "Under no circumstances shall Burberry nor any Business Associate use or in any way benefit from any form of Modern Slavery including but not limited to, forced, bonded or involuntary prison labor"; "There shall be no child labor."; "There shall be no discrimination in hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation." [Ethical Trading Code of Conduct, 12/05/2017: burberryplc.com] • Met: Respect H&S of workers: Burberry reports on the Global Health and Safety Policy that "is committed to providing a safe, healthy environment for employees, customers and all those who visit or work on its premises. Burberry therefore manages its business in a way that is designed to ensure that we maintain the highest standards of health and safety which are reasonably achievable throughout our global operations." [Global Health and Safety Policy, 2018: burberryplc.com] • Met: H&S applies to AP suppliers: On its Global Health and Safety Policy, Burberry has an explicit expectation to its suppliers to commit to Global Health and Safety Policy from the Company. [Global Health and Safety Policy, 2018: burberryplc.com] • Met: working hours for workers: It is described on the Ethical Trading Code of Conduct that working hours, excluding overtime, shall be defined by contract, and shall not exceed 48 hours per week. Also includes requirements on resting periods. [Ethical Trading Code of Conduct, 12/05/2017: burberryplc.com] • Met: Working hours for AP suppliers: It is clearly described on Ethical trade code of conduct that the standard provision that Burberry follow are also expected to all Business Associates, and as indicated above contains commitments on working hours including maximum time and rest periods. [Ethical Trading Code of Conduct, 12/05/2017: burberryplc.com]
A.1.3.AP	Commitment to respect human rights particularly relevant to the industry (AP)	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: Migrant worker's rights: Burberry has a Migrant workers policy stating "Burberry is committed to respecting migrant workers' rights [...]" in which it is described how the Company is committed to respect migrant's workers rights. [Migrant Worker Policy, 2019: burberryplc.com] • Met: Expecting suppliers to respect these rights: Burberry requires its Business Associates to respect the international principles and conventions in which the policy is based, and adhere to the provisions within Burberry's Migrant Worker Policy. One of the provisions state that "The Business Associate cannot use illegal immigrants anywhere in its supply chain." [Migrant Worker Policy, 2019: burberryplc.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: CEDAW/Women's Empowerment Principles • Not met: Child Rights Convention/Business principles • Met: Convention on migrant workers: The Company states in its Migrant Worker Policy that is committed to respecting migrant workers' rights and upholding the principles of International Convention on the Protection of the Rights of All Migrant Workers and Members of Their Families. [Migrant Worker Policy, 2019: burberryplc.com] • Met: Respecting the right to water: Burberry says that is committed to, and require all our supply chain partners to commit to, respecting and upholding the human rights principles set out in some conventions such as The International Bill of Human Rights (for example in relation to just and favourable conditions of work, the health and safety of workers and their right to water and sanitation). [Human Rights Policy, 2019, 3/18/2019: burberryplc.com] • Met: Expecting suppliers to respect these rights: See above. [Human Rights Policy, 2019, 3/18/2019: burberryplc.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1.4	Commitment to engage with stakeholders	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Commits to stakeholder engagement: The Company states in its Human Rights Policy that is committed to engaging with potential or affected stakeholders on the issue of human rights through interviews and dialogue with those who are affected by Burberry's operation. [Human Rights Policy, 2019, 3/18/2019: burberryplc.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Commits to engage stakeholders in design: In its website, on Human rights section, the Company discloses that "we engage with affected relevant stakeholder groups to better understand their needs and perceptions, get insight into the direct and indirect impacts of our business and develop focused mitigation plans". The Company describes an example that "on its product supply chain reliant on artisan craft and skills, the artisans and their communities are consulted on a regular basis to ensure that their views and priorities are included within the design and ongoing implementation of a project to promote their working conditions and livelihoods." [Company Website, Human Rights Policy, 2019: burberryplc.com]
A.1.5	Commitment to remedy	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Commits to remedy: Burberry says in its Human Rights Policy that is "committed to remedy any adverse impacts on individuals, workers and communities that we have caused or contributed to and recognize this should not obstruct access to any other remedies. " [Human Rights Policy, 30/08/2017: burberryplc.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Not obstructing access to other remedies: See above. [Human Rights Policy, 30/08/2017: burberryplc.com] • Not met: Collaborating with other remedy initiatives • Met: Work with AP suppliers to remedy impacts: The Company states in its Human Rights Policy that it is committed to working with its business associates to remedy adverse impacts which are directly linked to its operations, products or services and through collaborating with third-party NGOs or civil society as required and that the affected stakeholders of any human rights concern will remain its foremost priority. [Human Rights Policy, 30/08/2017: burberryplc.com]
A.1.6	Commitment to respect the rights of human rights defenders	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Zero tolerance attacks on HRs Defenders (HRDs) <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Expects AP 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	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: CEO or Board approves policy: In its Human Rights Policy, the Company describes that the "overall approval and responsibility for this Policy resides with Burberry's Chief Executive Officer, Marco Gobetti". [Human Rights Policy, 2019, 3/18/2019: burberryplc.com] • Not met: Board level responsibility for HRs: In its Human Rights Policy, Burberry discloses that 'The implementation of Human and Labour Rights is overseen by the Chair of the Ethics Committee, who has operational responsibility for human and labour rights and reports into the CEO and the Board'. In addition the Company states on its website that 'Human rights risks are reported via the Burberry Ethics Committee, chaired by the General Counsel, and attended by the Company Secretary, Senior Vice President of Risk Management & Audit, Vice President of Corporate Responsibility and Director of Asset and Profit Protection. The Ethics Committee reports to the Risk Committee, which reports to the Audit Committee at Board level'. However, it is not clear if a member of the Board has oversight of human rights. [Human Rights Policy, 2019, 3/18/2019: burberryplc.com & Company Website, Human Rights Policy, 2019: burberryplc.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Speeches/letters by Board members or CEO: Although the CEO's letter mentions gender pay gap, there is no additional mention to human rights in general or to other issues related to human rights. [CEO Letter 2018, 2017/18: burberryplc.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
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 • Not met: Examples or trends re HR discussion Score 2 <ul style="list-style-type: none"> • Not met: Both examples and process
A.2.3	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: Incentives for at least one board member • Not met: At least one key AP HR risk, beyond employee H&S Score 2 <ul style="list-style-type: none"> • Not met: Performance criteria made public

B. Embedding Respect and Human Rights Due Diligence (25% of Total)

B.1 Embedding Respect for Human Rights in Company Culture and Management Systems (10% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.1	Responsibility and resources for day-to-day human rights functions	1.5	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: Please, see indicator A.1.2 [Human Rights Policy, 2019, 3/18/2019: burberryplc.com] • Met: Senior responsibility for HR: "The implementation of Human and Labour Rights is overseen by the Chair of the Ethics Committee, who has operational responsibility for Human and Labour Rights and reports into the CEO and the Board." [Human Rights Policy, 2019, 3/18/2019: burberryplc.com] Score 2 <ul style="list-style-type: none"> • Met: Day-to-day responsibility: The Company states that "Responsibility for the policy lies with Burberry's Chief Executive Officer, while our Chief Human Resources Officer and global HR team ensure that the policy is upheld in our direct operations". [Company Website, Human Rights Policy, 2019: burberryplc.com] • Not met: Day-to-day responsibility for AP in supply chain: Although the Company states on its website, in the human rights section, that: 'The Vice President of Corporate Responsibility, who reports into the Chief Supply Chain Officer, is responsible for overseeing human rights in our supply chain', there is no description about how the management of human rights issues on supply chain is made. [Company Website, Human Rights Policy, 2019: burberryplc.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: The Company discloses who are responsible for its human rights policies along own operations and supply chain and states that 'each individual in our sourcing team has personal objectives related to ethical trading, which has been a key driver in embedding responsibility into our way of working'. However, we found no evidence as to whether there is an financial incentive or performance management scheme linked to aspects of its human rights policy. [Company Website, Human Rights Policy, 2019: burberryplc.com] Score 2 <ul style="list-style-type: none"> • Not met: At least one key AP HR risk, beyond employee H&S • Not met: Performance criteria made public
B.1.3	Integration with enterprise risk management	2	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: Burberry describes In its Annual Report that Human Rights are integrated as part of the Company's risk system as a compliance risk and use as an example that: "Non-compliance with labour, human rights and environmental standards across our own operations and extended supply chain would go against our Responsible Business Principles and could result in financial penalties, disruption in production and reputational damage to our business". [Annual Report, 06/06/2018: burberryplc.com] Score 2 <ul style="list-style-type: none"> • Met: Audit Ctte or independent risk assessment: To ensure compliance with our Human Rights Policy, we assess human rights impacts and monitor labour conditions across our own operations and extended supply chain on a regular basis through our Ethical Trading programme, delivered by an established global team of Ethical Trading experts. We conduct a Human Rights Impact Assessment every two years to confirm potential areas of risk, capture any emerging risks in relation to new operations and projects, and review or develop mitigation plans as required. Assessment has been carried out by Human Rights Consultancy Ergon. [Annual

Indicator Code	Indicator name	Score (out of 2)	Explanation
			Report, 06/06/2018: burberryplc.com & Company Website, Human Rights Policy, 2019: burberryplc.com]
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 <ul style="list-style-type: none"> • Met: Commits to ILO core conventions • Not met: Communicates its policy to all workers in own operations: The Company states that its policy "applies to all employees globally and is communicated via our intranet'. However, the Company does not describe if the communication is made in local languages where it is necessary. [Company Website, Human Rights Policy, 2019: burberryplc.com] Score 2 <ul style="list-style-type: none"> • Met: Commits to all 4 ILO core conventions • Not met: Communication of policy commitments to stakeholder: Although the company state on its Human Rights policy that Burberry work with suppliers to comply with its policies, it is not clear now the communication of the company's policies are made accessible. [Human Rights Policy, 2019, 3/18/2019: burberryplc.com] • Not met: How policy commitments are made accessible to audience: see above
B.1.4.b	Communication /dissemination of policy commitment(s) to business relationships	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 all 4 ILO core conventions for suppliers • Not met: Communicating policy down the whole AP supply chain: Burberry states that 'from 2018/19, we are including our packaging, visual merchandising, repurposing and recycling supply chains within our ethical trading programme, assessing risk, completing audits when required and working with suppliers to implement continuous improvement plans. In 2016/17, we provided tailored training to suppliers on identifying and combatting modern slavery. In-person training sessions were held with finished goods vendors who together manufacture 72% of our products. Initially, this training was provided to key finished goods and raw material suppliers, third-party labour contractors and certain suppliers operating in sectors with a greater risk of modern slavery issues arising.'" However, it is not clear how other aspects of its human rights policy commitment(s) were communicated to its business relationships. [Transparency in the supply chain and modern slavery statement, 09/05/2019: burberryplc.com] Score 2 <ul style="list-style-type: none"> • Met: Requiring AP suppliers to communicate policy down the chain • Met: How HR commitments made binding/contractual: 'To promote human rights across our direct and indirect business operations, we require our network of business associates and extended supply chain to comply with our Principles. The Principles are informed by our longstanding membership of the United Nations Global Compact and the Ethical Trading Initiative (ETI), and are underpinned by the International Bill of Human Rights and the Fundamental Conventions of the International Labour Organization. The Principles apply to all our business associates, which include, but are not limited to: finished goods suppliers, raw material suppliers, non-stock suppliers, construction contractors, licensees and franchisees'. [Transparency in the supply chain and modern slavery statement, 09/05/2019: burberryplc.com] • Not met: Including on AP suppliers
B.1.5	Training on Human Rights	2	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Scores at least 1 on A.1.2 • Met: Trains all workers on HR policy commitments: The Company states that all Burberry employees are introduced to the Company's Corporate Responsibility policies and programs during their induction training, which is informed by Burberry's Human Rights Impact Assessment, bespoke modern slavery and labour rights training has been developed, in conjunction with ethical trade, human rights and labour standards consultancy. [Burberry Modern Slavery & Transparency in Supply Chain, 2017/18: burberryplc.com] • Met: Trains relevant AP managers including procurement: In its Burberry Modern Slavery & Transparency, the Company states how many workers received training on human rights issues, including procurement. [Burberry Modern Slavery & Transparency in Supply Chain, 2017/18: burberryplc.com] Score 2 <ul style="list-style-type: none"> • Met: Score of 2 on A.1.2 • Met: Both requirements under score 1 met
B.1.6	Monitoring and corrective actions	1.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Scores at least 1 on A.1.2

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Met: Monitoring implementation of HR policy commitments: The Company states in its Ethical Code of Conduct that it "monitors its implementation using a variety of methods including audits and site visits to assess performance against the Ethical Trading Code of Conduct" and that "Burberry is committed to working collaboratively with industry partners, government organizations, non-governmental organizations (NGOs) and trade unions to implement the Ethical Trading Code of Conduct effectively and use the most relevant techniques to assess policy adherence." [Ethical Trading Code of Conduct, 12/05/2017: burberryplc.com] • Met: Monitoring AP suppliers: On its Annual Report, the Company indicates that it visits the supply chain partners on a regular basis, engaging with both management and workers to review performance and drive improvements on the implementation of its Ethical Trading Programme, with a focus on how they can "make the most meaningful, positive impacts on the lives of people throughout our supply chain". Additionally, on the Annual report is clear that Burberry assesses "human rights impacts and monitor labour conditions in operations and supply chain on a regular basis to ensure that Human Rights Policy is upheld". [Annual Report, 06/06/2018: burberryplc.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 describes in its responsible business principles the corrective action process it takes when Burberry identifies critical non-compliance(s) in respect of the Business Associate. However, there is no description about the number of incidence. [Responsible Business Principles, 2019: burberryplc.com] • Met: Example of corrective action: The Company gives an example on its Annual Report of corrective action made in Burberry operation. When they find that accessing grievance mechanisms is particularly challenging, the Company makes it a priority to introduce confidential, NGO-run hotlines. Currently, more than 10,000 workers across 21 factories are provided with improved access to remedy and confidential support, including advice and information on workers rights and wellbeing. [Annual Report, 06/06/2018: burberryplc.com] • Met: Discloses % of AP supply chain monitored: On its website the Company states that "To ensure compliance with our Responsible Business Principles, our Ethical Trading Programme covers all finished goods vendors, sub-contractors and 70% of raw material suppliers (known collectively as suppliers)". [Ethical Trading, 2019: burberryplc.com]
B.1.7	Engaging business relationships	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: HR affects AP selection of suppliers: Burberry states on its website, on the section "Transparency in the supply chain", that when "New raw material suppliers are required to confirm they will adhere to the Principles and comply with applicable local laws. They agree that we may visit and assess their own compliance and that of their suppliers. Before any new supplier is approved to participate in the Burberry supply chain, they are risk assessed for social compliance and any indication of forced, bonded or trafficked labour. If during this risk assessment a vulnerable workforce or geographical location risk is identified, a full audit will be completed and the results and the remediation plans (if any) will be evaluated before a decision on whether or not to approve is taken". "In addition, before a factory is approved to produce Burberry finished goods, we assess its compliance with the Principles and applicable laws and commitment to uphold them. The responsibility team must be satisfied that the factory will uphold these standards before giving approval for production to begin". [Transparency in the supply chain and modern slavery statement, 09/05/2019: burberryplc.com] • Met: HR affects on-going AP supplier relationships: In the Ethical Trading Code of Conduct, the Company commits to respect the fundamental principles and rights of the ILO and that whenever serious breaches of the Ethical Trading Code of Conduct persist, Burberry will consider termination of the business relationship with the Business Associate concerned, which also includes the supply chain as described on Burberry Parted Non-Compliance Policy. [Ethical Trading Code of Conduct, 12/05/2017: burberryplc.com & Burberry Partner Non-Compliance Policy: burberryplc.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Both requirement under score 1 met • Met: Working with AP suppliers to improve performance: The Company states that is committed to work with all relevant bodies to deliver effective action plans for the implementation of its Code of Conduct. Burberry states that "by working together with all Business Associates, Burberry can strengthen our business and improve the quality of life of the people who Burberry touch". In addition the

Indicator Code	Indicator name	Score (out of 2)	Explanation
			Company provides an example of how it is made in practice. "In Italy and the UK, where our top finished goods vendors use sub-contractors for some production, we have designed a programme to help them introduce their own ethical trading monitoring programmes into their network. During 2017/18, the number of finished goods vendors involved in the programme more than doubled." [Ethical Trading Code of Conduct, 12/05/2017: burberryplc.com & Transparency in the supply chain and modern slavery statement, 09/05/2019: burberryplc.com]
B.1.8	Approach to engagement with potentially affected stakeholders	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Stakeholder process or systems: The Company states in its Human Rights Impacts Assessments that is "now conducting interviews with affected stakeholder groups, to better understand their needs and perceptions, get a real insight into the direct and indirect impacts of our business and develop focused mitigation plans". However, no evidence found of descriptions of the process to actually identify and engage affected stakeholders. [Human Rights Policy, 30/08/2017: burberryplc.com & Human Rights Impact Assessment, 2019: burberryplc.com] • Not met: Frequency and triggers for engagement • Not met: Workers in AP SC engaged • Not met: Communities in the AP SC engaged Score 2 <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	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Identifying risks in own operations: The Company has a Human Rights Materiality Analysis which identifies the main human rights risks that might arise during its business activities. Additionally, Burberry reviewed all of its operations (whether direct or indirect) and their potential impact on human rights, having identified four focus stakeholder groups: direct workers, supply chain workers, local communities and customers. [Human Rights Policy, 30/08/2017: burberryplc.com] • Met: Identifying risks in AP suppliers: In the Human Rights Materiality Analysis is indicated that both direct and indirect operations are reviewed for potential human rights risks. [Human Rights Policy, 30/08/2017: burberryplc.com] Score 2 <ul style="list-style-type: none"> • Not met: Ongoing global risk identification • Met: In consultation with stakeholders: Burberry states on the Human Rights Impacts Assessments that it conducts interviews with affected stakeholder groups to better understand their needs and perceptions, understand the direct and indirect impacts of its business and has a process to map the operation to identify stakeholder groups and the most salient potential human rights impacts in relation to them. [Human Rights Impact Assessment, 2019: burberryplc.com] • Met: In consultation with HR experts: In the report Human Rights Impacts Assessments Burberry says that "risks and mitigation plans have been reviewed by Ergon, a specialist consultancy in the field of human rights, and discussed with Oxfam, a globally renowned aid and development charity". [Human Rights Impact Assessment, 2019: burberryplc.com] • Not met: Triggered by new circumstances
B.2.2	Assessing: Assessment of risks and impacts identified (salient risks and key industry risks)	2	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Salient risk assessment (and context): In its Human Rights Impacts Assessment, Burberry describes its process of mapping its direct and indirect operations' exposure to human rights risks, taking into consideration geographical, economical and social factors. As a result, the Company identified key stakeholder groups and the most prominent human rights potential impacts. [Human Rights Impact Assessment, 2019: burberryplc.com & Transparency in the supply chain and modern slavery statement, 09/05/2019: burberryplc.com] • Met: Public disclosure of salient risks: The company states that "in 2014 we conducted a Human Rights Impact Assessment of our operations and activities and those of our extended supply chain, to identify and address potential risks. We reviewed this assessment in 2016, to capture emerging risks in relation to new operations and projects and to develop mitigation plans as required. Over the last year, to strengthen our efforts in this field even further, we have developed long term

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>strategies for key themes arising from our 2018/19 Human Rights Impact Assessment, including migrant workers, income vulnerable workers, diversity and inclusion." [Transparency in the supply chain and modern slavery statement, 09/05/2019: burberryplc.com & Human Rights Impact Assessment, 2019: burberryplc.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Met: Both requirements under score 1 met
B.2.3	Integrating and Acting: Integrating assessment findings internally and taking appropriate action	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Action Plans to mitigate risks: Burberry states that 'Human rights risks are reported via the Burberry Ethics Committee, chaired by the General Counsel, and attended by the Company Secretary, Senior Vice President of Risk Management & Audit, Vice President of Corporate Responsibility and Director of Asset and Profit Protection. The Ethics Committee reports to the Risk Committee, which reports to the Audit Committee at Board level. In the event that any labour or human rights risks are identified, the Chief Supply Chain Officer will report on such issues to the Group's Risk Committee, which meets at least three times a year'. Also, the Company discloses that has 'a global responsibility team consisting of around 35 specialists in key locations globally. [...] Our ethical trading programme is supported and monitored internally by a number of management committees. The Programme aims to ensure that the potential risks to labour and human rights are considered at all appropriate levels and areas of the business'. Although the Company describes its governance process when some risk related to human rights is identified, there is no description about how is its global system to take action to prevent or mitigate its salient human rights issues. As Burberry describes it seems that the Company act in a reactive way when some problem happens not in a preventive method. [Transparency in the supply chain and modern slavery statement, 09/05/2019: burberryplc.com & Company Website, Human Rights Policy, 2019: burberryplc.com] • Met: Including in AP supply chain: 'Monitoring and verification activities are carried out throughout our finished goods and key raw material supply chains to support compliance with the Principles. To ensure our supply chain mapping stays up to date, we operate a strict approval process and conduct a transparency analysis with our vendors and commercial teams each season. Following this analysis, we conduct an assessment to identify any new or emerging areas of risk. If during this risk assessment a vulnerable workforce or geographical location risk is identified, a full audit will be completed and the results and the remediation plans (if any) will be evaluated before a decision on whether or not to approve is taken. In addition, before a factory is approved to produce Burberry finished goods, we assess its compliance with the Principles and applicable local laws and commitment to uphold them. The responsibility team must be satisfied that the factory will uphold these standards before giving approval for production to begin'. [Transparency in the supply chain and modern slavery statement, 09/05/2019: burberryplc.com] • Met: Example of Actions decided: "Mitigation plans have been developed and are being implemented and continually monitored (...) As an example, where we identified salient human rights risks within factories, we provide confidential, local NGO-run hotlines in relevant languages for workers in our supply chain". [Human Rights Impact Assessment, 2019: burberryplc.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met
B.2.4	Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts	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 monitors the implementation of the Ethical Trading Code of Conduct through a variety of methods including audits and site visits. However, no evidence found on whether it has a system to check if actions taken in response o human rights impacts and risks assessed have been effective. [Ethical Trading Code of Conduct, 12/05/2017: burberryplc.com] • Not met: Lessons learnt from checking effectiveness <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirement under score 1 met
B.2.5	Communicating : Accounting for how human rights impacts are addressed	0.5	<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 has communicated that it has a system to identify human rights risks and impacts including own operations and supply chain. • Not met: Comms plan re assessing risks

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not met: Comms plan re action plans for risks • Not met: Comms plan re reviewing action plans • Not met: Including AP suppliers Score 2 <ul style="list-style-type: none"> • Not met: Responding to affected stakeholders concerns: Burberry says that it will investigate what is reported by local stakeholders and resolve it, when appropriate. However it does not describe the process it implements. [Burberry Local Stakeholder Engagement Policy, 18/02/2019: burberryplc.com] • Not met: Ensuring affected stakeholders can access communications: The Company does not explain how the stakeholders have access to these communications.

C. Remedies and Grievance Mechanisms (15% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.1	Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers	1.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Channel accessible to all workers: Burberry says in its Human Rights Policy that provides a helpline called Burberry Confidential, that is available to all employees, where they can report, anonymously, any concerns relating to malpractice, with all cases treated in the strictest confidence. Burberry expects its suppliers to have similar mechanisms to allow workers to anonymously raise concerns and grievances. [Human Rights Policy, 30/08/2017: burberryplc.com] Score 2 <ul style="list-style-type: none"> • Not met: Number grievances filed, addressed or resolved: Although the Company says in its Annual Report that during 2017/18 it received 588 calls (42 complaints, 469 consulting and 77 psychological support) that were monitored closely by the local Responsibility team, it does not say how many were related to human rights. [Annual Report, 06/06/2018: burberryplc.com] • Not met: Channel is available in all appropriate languages • Met: Expect AP supplier to have equivalent grievance systems: Through its Ethical Trading Programme, Burberry upholds the rights for all workers in the supply chain to freely join a trade union. Burberry also requires factories to provide a grievance mechanism that is communicated to, understood by and applied fairly to their employees. This is verified by the activities of the Ethical Trading Programme. Also, Burberry Confidential is extended to our supply chain allowing those working to report any concerns relating to malpractice anonymously with all cases treated in the strictest confidence. [Human Rights Policy, 30/08/2017: burberryplc.com]
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 <ul style="list-style-type: none"> • Not met: Grievance mechanism for community: On its website the Company provide some contacts that communities can access, but there is no mention that these external stakeholders can access the grievance mechanism channel. Also, on its Local Stakeholder Engagement Policy there is no evidence how communities can access its grievance mechanisms to make complaints. [Burberry Local Stakeholder Engagement Policy, 18/02/2019: burberryplc.com & Company website, Contacts, 2019: burberryplc.com] Score 2 <ul style="list-style-type: none"> • Not met: Describes accessibility and local languages • Not met: Expects AP supplier to have community grievance systems • Not met: AP 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 <ul style="list-style-type: none"> • Not met: Engages users to create or assess system: The Company does not provide any example or statement about how potential or actual users of the grievance mechanisms are involved in the design and performance of the channel [Burberry Local Stakeholder Engagement Policy, 18/02/2019: burberryplc.com & Company website, Contacts, 2019: burberryplc.com] Score 2 <ul style="list-style-type: none"> • Not met: Description of how they do this • Not met: Engages with users on system performance • Not met: Provides user engagement example on performance • Not met: AP suppliers consult users in creation or assessment
C.4	Procedures related to the mechanism(s)/channel(s) are publicly	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Response timescales: The Company does not provide any evidence on its documents about its procedures for managing the complaints received on the grievance mechanism and its response timescales. [Burberry Local Stakeholder

Indicator Code	Indicator name	Score (out of 2)	Explanation
	available and explained		Engagement Policy, 18/02/2019: burberryplc.com & Company website, Contacts, 2019: burberryplc.com <ul style="list-style-type: none"> • Not met: How complainants will be informed Score 2 <ul style="list-style-type: none"> • Not met: Escalation to senior/independent level
C.5	Commitment to non-retaliation over complaints or concerns made	1.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Public statement prohibiting retaliation: Burberry states in its Human Rights Policy that it "prohibits retaliation against anyone raising a complaint and any other stakeholders for raising human rights related concerns". [Human Rights Policy, 2019, 3/18/2019: burberryplc.com] • Met: Practical measures to prevent retaliation: "Burberry Confidential is a helpline and web service managed by an independent company called 'InTouch', allowing employees and the supply chain to report, anonymously, any concerns relating to malpractice, with all cases treated in the strictest confidence." [Human Rights Policy, 2019, 3/18/2019: burberryplc.com] Score 2 <ul style="list-style-type: none"> • Not met: Has not retaliated in practice • Met: Expects AP suppliers to prohibit retaliation: Burberry discloses in its website that "prohibits retaliation against anyone raising a complaint and any other stakeholders for raising human rights related concerns and requires our supply chain partners to follow the same approach". [Human Rights Policy, 2019, 3/18/2019: burberryplc.com]
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 <ul style="list-style-type: none"> • Not met: Won't impede state based mechanisms • Not met: Complainants not asked to waive rights Score 2 <ul style="list-style-type: none"> • Not met: Will work with state based or non judicial mechanisms • Not met: Example of issue resolved (if applicable)
C.7	Remedying adverse impacts and incorporating lessons learned	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Describes how remedy has been provided: The company states that 'through this year's audits of the product and licensee supply chains, we have identified instances at 9 facilities where workers have paid fees for recruitment. We have worked with facility management to ensure workers were refunded. We also identified two facilities where management was holding worker passports. Both instances were resolved within a few days and workers' identity documentation returned. To prevent future issues, we continue to re-communicate policies, review recruitment journeys of migrant workers and develop fee-free recruitment chains. [Burberry Modern Slavery & Transparency in Supply Chain, 2017/18: burberryplc.com] Score 2 <ul style="list-style-type: none"> • Not met: Changes introduced to stop repetition • Not met: Approach to learning from incident to prevent future impacts • Not met: Evaluation of the channel/mechanism

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.2.1.b	Living wage (in the supply chain)	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Living wage in supplier code or contracts: We require all our supply chain partners, whether they are providing products or services, to agree with our Responsible Business Principles. These include the Burberry Ethical Trading Code of Conduct, Migrant Worker and Homeworker Policy. On its Website in the section "Ethical Trading Code of Conduct" the Company discloses that living wages shall be paid and describes living wages as the following principles: "- A Living Wage should be calculated by reference to the income an individual needs to earn to live a decent life (where basic standards of living are met) and to participate fully in society - The Living Wage for any country should be set by reference to local living standards and needs - The Living Wage should be set in a transparent way, independent of control or manipulation by government, employers or other parties

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>- A Living Wage should be sufficient to pay for a locally agreed basket of goods, which is likely to include food, housing, utilities, transport, a degree of leisure and potentially education, health insurance, childcare, servicing debt and savings. A Living Wage is likely to include support for family members as defined in the local context</p> <p>- A Living Wage should be paid to all employees (male and female) over a locally agreed minimum working age.</p> <p>- A Living Wage should be paid voluntarily by employers" [Ethical Trading Code of Conduct, 12/05/2017: burberryplc.com & Ethical Trading Code of Conduct, 2019: burberryplc.com]</p> <ul style="list-style-type: none"> • Not met: Improving living wage practices of suppliers <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met • Not met: Provide analysis of trends demonstrating progress
D.2.2	Aligning purchasing decisions with human rights	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: Avoids business model pressure on HRs: Although the Company specifies that the Business partners and suppliers should follow the Principles of Human Rights Policy doing business with Burberry, works with its business associates to support their compliance, and may take action against those that do not demonstrate sufficient commitment to the Principles, or are in breach of them. In the event of a business associate being found to be involved in modern slavery, it is not described the practices it adopts to avoid price or short notice requirement or positive incentive it puts into place through its purchasing practices to encourage its business relationship to act with respect for human rights. <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Positive incentives to respect human rights • Not met: Both requirements under score 1 met
D.2.3	Mapping and disclosing the supply chain	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Identifies suppliers back to product source: The Company has responsible sourcing policy where is described that they do not authorize sourcing from certain countries including but not limited to Bangladesh, Pakistan and Cambodia. However Burberry does not specify a list or mapping of suppliers. [Responsible Sourcing Policy, 2017/18] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Discloses significant parts of supply chain and why
D.2.4.b	Prohibition on child labour: Age verification and corrective actions (in the supply chain)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Child Labour rules in codes or contracts: Burberry's outlines requirements which all business associates must uphold in relation to their own employees and throughout their own supply chain network such as child labour shall not be used. However, no evidence found on age verification and remediation programmes. [Burberry Modern Slavery & Transparency in Supply Chain, 2017/18: burberryplc.com] <p>Score 2</p> <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: Provide analysis of trends demonstrating progress
D.2.5.b	Prohibition on forced labour: Debt bondage and other unacceptable financial costs (in the supply chain)	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Debt and fees rules in codes or contracts: Burberry states in its Migrant Work Policy that business associate should not retain any money from the workers' wages, including but not restricted to Recruitment Fee, levies, deposits or guarantee monies, or compulsory savings schemes. In addition, the Company states on its website, in the section "Migrant Worker Policy" that "Burberry's Migrant Worker Policy is intended to protect workers who may be vulnerable to exploitation during domestic and / or international migration. Our policy sets standards we uphold in relation to our own employees and for our supply chain partners to uphold in relation to all their workers, not just those who have migrated for work". [Migrant Worker Policy, 2019: burberryplc.com & Migrant Work Policy, 23/05/2018: burberryplc.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> Met: How working with suppliers on debt & fees: The Company states that in 2018/19, conducted 481 audits and 221 engagement visits or training sessions. Through this year's audits of the product and licensee supply chains, Burberry have identified instances at 9 facilities where workers have paid fees for recruitment. The Company discloses that "have worked with facility management to ensure workers were refunded". To prevent future issues, we continue to re-communicate policies, review recruitment journeys of migrant workers and develop fee-free recruitment chains". [Transparency in the supply chain and modern slavery statement, 09/05/2019: burberryplc.com] Score 2 <ul style="list-style-type: none"> Met: Both requirements under score 1 met Not met: Provide analysis of trends in progress made
D.2.5.d	Prohibition on forced labour: Restrictions on workers (in the supply chain)	1.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Met: Free movement rules in codes or contracts: Burberry states on its Migrant Work Policy that no worker's identity papers (including passport, visa or equivalent papers, ATM, cards, bank / savings books or certificates of qualification) should be held by the business associate (any individual, entity, company, partnership or any other body or group supplying products components, services, real estate or anything else, directly or indirectly, to any member of the Burberry Group or otherwise working directly or indirectly with or on behalf of any member of the Burberry Group) or any third party. [Migrant Worker Policy, 2019: burberryplc.com] <ul style="list-style-type: none"> Met: How these practices are implemented and monitored for agencies, labour brokers or recruiters: The Company states that "in 2018/19, conducted 481 audits and 221 engagement visits or training sessions. Through this year's audits of the product and licensee supply chains, Burberry identified two facilities where management was holding worker passports. Both instances were resolved within a few days and workers' identity documentation returned. To prevent future issues, we continue to re-communicate policies, review recruitment journeys of migrant workers and develop fee-free recruitment chains". [Transparency in the supply chain and modern slavery statement, 09/05/2019: burberryplc.com] Score 2 <ul style="list-style-type: none"> Met: Both requirements under score 1 met Not met: Provide analysis of trends in progress made
D.2.6.b	Freedom of association and collective bargaining (in the supply chain)	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Met: FoA & CB rules in codes or contracts: Burberry's Ethical Trading Code of Conduct states that the Company sets out standards to uphold in relation to their own employees and for its supply chain partners' employees. In terms of the supply chain, Burberry requires agreement to the Code of Conduct from all those involved in its extended supply chain, including all Business Associates. The Code of Conduct requires commitment to respect and not interfere with the workers' right to join or establish trade unions of their own choice and to bargain collectively. [Ethical Trading Code of Conduct, 12/05/2017: burberryplc.com] <ul style="list-style-type: none"> 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: Provide analysis of trends in progress made
D.2.7.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 Not met: Injury rate disclosures Not met: Lost days or near miss disclosures Not met: Fatalities disclosures Score 2 <ul style="list-style-type: none"> Not met: How working with suppliers on H&S Not met: Provide analysis of trends in progress made
D.2.8.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 requirement under score 1 met Not met: Provide analysis of trends in progress made

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.2.9.b	Working hours (in the supply chain)	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Working hours in codes or contracts: Burberry's Ethical Trading Code of Conduct sets out standards to uphold in relation to its own employees and for its supply chain partners to uphold in relation to their employees. The Code of Conduct requires a detailed commitment to respect non excessive working hours and that workers shall be provided with at least one day off in every 7 day period. [Ethical Trading Code of Conduct, 12/05/2017: burberryplc.com] • Not met: How working with suppliers on working hours <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met • Not met: Provide analysis of trends in progress made

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
E(1).0	Serious allegation No 1		<ul style="list-style-type: none"> • Headline: Burberry to pay USD 2.45 million to settle overtime lawsuit • Area: Working hours • Story: In July 2017, Burberry has agreed to pay USD 2.54 million to 643 of its USA workers to settle a lawsuit on overtime work. Employees of various departments, from sales managers to beauty consultants and dispatch workers, asserted they were forced to carry out free overtime work, from half an hour to an hour every evening, to clean the stores or perform other menial tasks. • Sources: [New York Post - 17/6/2017: nypost.com][Top Class Actions - 15/8/2017: topclassactions.com][Fashion Network - 19/7/2017: us.fashionnetwork.com]
E(1).1	The Company has responded publicly to the allegation	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Public response available: The company has not responded to the unpaid overtime hours allegation directly, but it has settled the lawsuit agreeing to pay USD 2.54 million to 643 workers in the USA. <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Response goes into detail
E(1).2	The Company has appropriate policies in place	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: Company policies address the general issues raised: Burberry states that all of its entities and supply chain partners are expected to comply with all applicable laws and human rights standards included in its Human Rights Policy. Additionally, Burberry states "We are committed to, and require all our supply chain partners to commit to, respecting and upholding the human rights principles set out in the ILO Conventions on Labour Standards on Working Hours." [Human Rights Impact Assessment, 2019: burberryplc.com] • Met: Policies apply to the type of business relationships involved: Burberry states that it is committed to the ILO Conventions on Labour Standards on Working Hours. [Human Rights Impact Assessment, 2019: burberryplc.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Policies address the specific rights in question: Burberry states that "Working hours must comply with national laws, collective agreements, and the provisions of paragraphs 6I to 6VI below, whichever affords the greater protection for workers. Paragraphs 6I to 6VI are based on international labour standards." This policy applies to Burberry's own operations and its supply chain. [Ethical Trading Code of Conduct, 12/05/2017: burberryplc.com]
E(1).3	The Company has taken appropriate action	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: Engages with affected stakeholders: There is no evidence that Burberry publicly engaged with stakeholders. However, the company has settled out of court in response to the allegations of unpaid overtime work. • Not met: Encourages linked business to engage affected stakeholders: There is no evidence to suggest that Burberry has encouraged linked businesses to engage with affected stakeholders. • Met: Provides remedies to affected stakeholders: Burberry has settled the class action lawsuit related to unpaid overtime allegations in the USA. The settlement totalled USD 2.54 million for 643 people. • Not met: Has reviewed management systems to prevent recurrence: There is no evidence to suggest that Burberry has reviewed its management systems in light of the overtime allegations.

Indicator Code	Indicator name	Score (out of 2)	Explanation
			Score 2 <ul style="list-style-type: none"> • Met: Remedies are satisfactory to the victims: Burberry has settled the class action lawsuit related to unpaid overtime allegations in the USA. The settlement totalled USD 2.54 million for 643 people. • Met: Has improved systems and engaged affected stakeholders

F. Transparency (10% of Total)

Indicator Code	Indicator name	Score	Explanation
F.1	Company willingness to publish information	2.4 out of 4	Out of a total of 40 indicators assessed under sections A-D of the benchmark, Burberry made data public that met one or more elements of the methodology in 24 cases, leading to a disclosure score of 2.4 out of 4 points.
F.2	Recognised Reporting Initiatives	0 out of 2	The individual elements of the assessment are met or not as follows: Score 2 <ul style="list-style-type: none"> • Not met: Company reports on GRI • Not met: Company reports on SASB • Not met: Company reports on UNGPRF
F.3	Key, High Quality Disclosures	0 out of 4	Burberry 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.

The Benchmark is made available on the express understanding that it will be used solely for general information purposes. The material contained in the Benchmark should not be construed as relating to accounting, legal, regulatory, tax, research or investment advice and it is not intended to take into account any specific or general investment objectives. The material contained in the Benchmark does not constitute a recommendation to take any action or to buy or sell or otherwise deal with anything or anyone identified or contemplated in the Benchmark. Before acting on anything contained in this material, you should consider whether it is suitable to your particular circumstances and, if necessary, seek professional advice. The material in the Benchmark has been put together solely according to the CHRB methodology and not any other assessment models in operation within any of the project partners or EIRIS Foundation as provider of the analyst team.

No representation or warranty is given that the material in the Benchmark is accurate, complete or up-to-date. The material in the Benchmark is based on information that we consider correct and any statements, opinions, conclusions or recommendations contained therein are honestly and reasonably held or made at the time of publication. Any opinions expressed are our current opinions as of the date of the publication of the Benchmark only and may change without notice. Any views expressed in the Benchmark only represent the views of CHRB Ltd, unless otherwise expressly noted.

While the material contained in the Benchmark has been prepared in good faith, neither CHRB Ltd nor any of its agents, representatives, advisers, affiliates, directors, officers or employees accept any responsibility for or make any representation or warranty (either express or implied) as to the truth, accuracy, reliability or completeness of the information contained in this Benchmark or any other information made available in connection with the Benchmark. Neither CHRB Ltd nor any of its agents, representatives, advisers, affiliates, directors, officers and employees undertake any obligation to provide the users of the Benchmark with additional information or to update the information contained therein or to correct any inaccuracies which may become apparent (save as to the extent set out in CHRB Ltd's appeals procedure). To the maximum extent permitted by law any responsibility or liability for the Benchmark or any related material is expressly disclaimed provided that nothing in this disclaimer shall exclude any liability for, or any remedy in respect of, fraud or fraudulent misrepresentation. Any

disputes, claims or proceedings this in connection with or arising in relation to this Benchmark will be governed by and construed in accordance with English law and submitted to the exclusive jurisdiction of the courts of England and Wales.

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.