

Company Name Columbia Sportswear
Industry Apparel (Supply Chain only)
Overall Score (*) 21.8 out of 100

Theme Score	Out of	For Theme
1.2	10	A. Governance and Policies
4.3	25	B. Embedding Respect and Human Rights Due Diligence
2.1	15	C. Remedies and Grievance Mechanisms
2.2	20	D. Performance: Company Human Rights Practices
10.6	20	E. Performance: Responses to Serious Allegations
1.4	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	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: General HRs commitment: The Company states in its Code of Business Conduct: 'We respect and protect human rights and we are committed to decent and humane working conditions. We do not tolerate any conduct that contributes to, encourages or facilitates human trafficking, child labor, forced or compulsory labor, or any other human rights abuses. This is true not only for our own workforce, but also for the employees of the manufacturers we contract with around the world'. [Code of Business Conduct and Ethics, Ap 2018: investor.columbia.com] <p>Score 2</p> <ul style="list-style-type: none"> Not met: UNGPs: The Company states in its 'Transparency in Supply Chain Statement' that it 'complies with the UN Guiding Principles on Business and Human Rights (UNGPs), which specify that due diligence processes should 'include assessing actual and potential human rights impacts, integrating and acting upon the findings, tracking responses and communication how impacts are addressed'. However, the commitment to the UNGPs is not clear. [Transparency in Supply Chain 2016, 2016: columbia.com] Not met: OECD
A.1.2	Commitment to respect the human rights of workers	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Not met: ILO Core: In its Code of Business Conduct the Company states: 'We respect and protect human rights and we are committed to decent and humane working conditions. We do not tolerate any conduct that contributes to,

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>encourages or facilitates human trafficking, child labor, forced or compulsory labor, or any other human rights abuses. This is true not only for our own workforce, but also for the employees of the manufacturers we contract with around the world, as further described in the Corporate Responsibility section of our Company website.' [...] 'we do not tolerate discrimination or harassment on the basis of any of these categories.' However, there is no mention to all ILO core (free association and collective bargaining is missing) and the commitment to respect each one of these rights is not clear enough. [Code of Business Conduct and Ethics, Ap 2018: investor.columbia.com]</p> <ul style="list-style-type: none"> • Not met: UNGC principles 3-6 • Met: Explicitly list ALL four ILO for AP suppliers: Its 'Standards of Manufacturing Practices', addressed to third-party manufacturing facilities, includes: prohibition to use Forced Labor or Child Labor, Non-discrimination, respect freedom of association and bargain collectively. With respect the last two, the document says: 'Supplier must recognize and respect the right of employees to associate, organize and bargain collectively. Where the right to freedom of association and collective bargaining is restricted under law, the supplier allows the development of parallel means for independent and free association and bargaining.' [Standards of Manufacturing Practices, 2018: columbia.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Explicit commitment to All four ILO Core: See above [Code of Business Conduct and Ethics, Ap 2018: investor.columbia.com] • Met: Respect H&S of workers: The Company also commits to maintaining a safe work environment, setting health and safety rules, regulations and policies. [Code of Business Conduct and Ethics, Ap 2018: investor.columbia.com] • Met: H&S applies to AP suppliers: Its 'Standards of Manufacturing Practices', also includes a section for Health and Safety: 'Suppliers must provide a safe and healthy workplace setting to prevent accidents and injury to health arising out of, linked with, or occurring in the course of work or as a result of the operation of suppliers' facilities. Supplier must comply with all applicable laws and regulations and CSC health & safety standards regarding working conditions, including any housing and cafeteria requirements.' [Standards of Manufacturing Practices, 2018: columbia.com] • Not met: working hours for workers [Code of Business Conduct and Ethics, Ap 2018: investor.columbia.com] • Not met: Working hours for AP suppliers: Its 'Standards of Manufacturing Practices' indicates: 'Supplier must not require workers to work more than the regular and overtime hours allowed by the law of the country where the workers are employed. The regular work week shall not exceed 48 hours; other than in exceptional circumstances, the sum of regular and overtime hours in a week shall not exceed 60 hours.' Also, 'supplier must allow workers at least 24 consecutive hours of rest in every seven-day period'. However, the Company opens the possibility to exceed the 60 hours limit in exceptional circumstances. [Standards of Manufacturing Practices, 2018: columbia.com]
A.1.3.AP	Commitment to respect human rights particularly relevant to the industry (AP)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Women's Rights • Not met: Children's Rights • Not met: Migrant worker's rights: In its Transparency in Supply Chain Statement 2017, there is a reference to a 'Migrant worker policy', but CHRB could not find this document in the public domain. [Transparency in Supply Chain 2016, 2016: columbia.com] • Not met: Expecting suppliers to respect these rights <p>Score 2</p> <ul style="list-style-type: none"> • Not met: CEDAW/Women's Empowerment Principles • Not met: Child Rights Convention/Business principles • Not met: Convention on migrant workers • Not met: Respecting the right to water: Although the Company reports working with Planet Water Foundation 'to help combat global water crisis by bringing clean water to the world's most disadvantaged communities, in its 'Doing Right - 2017 - Highlights' document, there is no direct reference to a proper commitment to respect the right to water. [Doing Right 2017 Highlights: columbia.com] • Not met: Expecting suppliers to respect these rights
A.1.4	Commitment to engage with stakeholders	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Commits to stakeholder engagement: In its website the Company indicates: 'We recognize that we are a single player in a large, complex, global supply chain. To impact meaningful change, we need to work with brand, industry,

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>and multi-stakeholder players [...]. However, there is no commitment to engage with its potentially and actually affected stakeholders. [Responsible Practices, Feb 2019: columbia.com]</p> <ul style="list-style-type: none"> • Not met: Regular stakeholder engagement: The Company indicates in its website that it works with different organizations in order to: 'Align on common standards for evaluating social and environmental impacts in our business and our supply chain. Standardization will enable greater efficiency in evaluation methods and comparability of results; Develop shared tools to reduce costs and improve methods for implementing social and environmental programs ; Share resources with industry partners on specific projects, such as audit and capacity building, to reduce audit fatigue and increase collective impact.' The Company selects these organizations based on their 'ability to influence systemic change and their relevance to our business and supply chain.' Among the selected organizations we can find: Outdoor Industry Association Sustainability Working Group, Sustainable Apparel Coalition, Fair Labor Association, UN International Labor Organization, Business for Social Responsibility-s HERproject, American Apparel & Footwear Association and Footwear Distributors and Retailers of America. However, there is no evidence of this engagement in the last 2 years and there are some groups which are not represented in the organizations mentioned (local communities, trade unions). [Responsible Practices, Feb 2019: columbia.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Commits to engage stakeholders in design • Not met: Regular stakeholder design engagement
A.1.5	Commitment to remedy	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Commits to remedy: In its website section 'Responsible Practices' the Company indicates that: 'Columbia employs a team of Corporate Responsibility Specialists who conduct regular audits of our suppliers against our SMP. All of our audits are conducted on an unannounced basis, allowing our Specialists to see the factory conditions as they are on a typical day. We work with the factories to develop a Corrective Action Plan to remediate issues identified during the audit. As we consider our suppliers as partners, our approach to remediation is continuous improvement, working together to improve working conditions.' However, there is no specific commitment to remedy the adverse impact on individual, workers and communities that it has caused or contributed to. [Responsible Practices, Feb 2019: columbia.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Not obstructing access to other remedies • Not met: Collaborating with other remedy initiatives • Not met: Work with AP suppliers to remedy impacts
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: According to its 'Code of Business Conduct': 'This Code [...] was adopted by the Board of Directors [...]. Amendments or changes to this Code may only be made by the Board of Directors'. [Code of Business Conduct and Ethics, Ap 2018: investor.columbia.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not met: Board level responsibility for HRs: In its 'Corporate Responsibility Report 2015', the Company indicates: 'The Corporate Responsibility Team is led by the Senior Director of Corporate Responsibility who reports to the Senior Executive Vice President of Legal & Corporate Affairs and Chief Administrative Officer, who reports directly to the Chief Executive Officer. Columbia's executive team, consisting of the CEO, President and COO, CFO, and CAO get regular updates with regards to Corporate Responsibility performance. Columbia Sportswear Company's Board of Directors are given annual performance updates.' It also states in its 'Code of Business Conduct' that the 'Board of Directors is responsible for the administration and enforcement of the Code but may delegate its responsibility to a committee of the Board'. However, there is no information about specific task related to governance oversight of one or more areas of respect for human rights. [Corporate Responsibility Report 2015, 2015: columbia.com & Corporate Governance Guidelines, Jan 2018: d1io3yog0oux5.cloudfront.net] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Speeches/letters by Board members or CEO
A.2.2	Board discussions	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: Board/Committee review of salient HRs • Not met: Examples or trends re HR discussion <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both examples and process
A.2.3	Incentives and performance management	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: Incentives for at least one board member: In its 'Compensation Committee Charter' the Company indicates how the Compensation Committee determine the compensation for the CEO and executive officers. In both cases the Committee shall consider the annual performance evaluation, competitive market data pertaining at comparable companies, and 'such other factors as it shall deem relevant, and shall be guided by, and seek to promote, the best interests of the Company and its shareholders.' There is no specific reference to a scheme linked to an aspect of the Company's human rights policy commitment. [Compensation Committee Charter, Jan 2018: d1io3yog0oux5.cloudfront.net] <p>Score 2</p> <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. Embedding Respect and Human Rights Due Diligence (25% of Total)

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.1	Responsibility and resources for day-to-day human rights functions	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Commits to ILO core conventions: See indicator A.1.2 • Met: Senior responsibility for HR: In its 'Corporate Responsibility Report', the Company indicates: 'The Corporate Responsibility Team is led by the Senior Director of Corporate Responsibility who reports to the Senior Executive Vice President of Legal & Corporate Affairs and Chief Administrative Officer, who reports directly to the Chief Executive Officer. [Corporate Responsibility Report 2015, 2015: columbia.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Day-to-day responsibility: In its 'Corporate Responsibility Report', the Company indicates: 'Columbia employs a team of Corporate Responsibility professionals who work with our suppliers to assess and improve social responsibility performance over time. Our team conducts regular audits of finished goods factories, with the goal of auditing 100% of factories at least once per year, or more often if we find serious issues. [Corporate Responsibility Report 2015, 2015: columbia.com] • Met: Day-to-day responsibility for AP in supply chain: See above. In addition, in its 'Transparency in Supply Chain Statement' document, the Company indicates: '[...] we maintained 10 manufacturing liaison office in a total of seven Asian countries. Personnel in these manufacturing liaison offices are direct employees of CSC and are responsible for overseeing production at our contract manufacturers. [...] to monitor factories for compliance with our policies, procedures and standards related to labor practices'. [Transparency in Supply Chain 2016, 2016: columbia.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.2	Incentives and performance management	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Senior manager incentives for human rights • Not met: At least one key AP HR risk, beyond employee H&S Score 2 <ul style="list-style-type: none"> • Not met: Performance criteria made public
B.1.3	Integration with enterprise risk management	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: HR risks is integrated as part of enterprise risk system: In its 'Transparency in Supply Chain Statement' document the Company indicates: 'CSC assesses the risks related to our apparel, footwear, accessories and equipment supply chains at the country, vendor and factory levels. Risk assessment is performed internally by our sourcing, legal and corporate responsibility teams on a regular basis. We recognize our industry has a risk of human trafficking in the form of migrant workers; in 2017 we began work to strengthen our migrant worker policy, and will begin additional migrant worker due diligence in 2018'. However, it is not clear how human rights risks are integrated ad part of its broader enterprise risk management system. [Transparency in Supply Chain 2016, 2016: columbia.com] Score 2 <ul style="list-style-type: none"> • Not met: Audit Ctte or independent risk assessment
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"> • Not met: Commits to ILO core conventions: See indicator A.1.2 • Not met: Communicates its policy to all workers in own operations: In its Code of Business Conduct the Company indicates: 'A copy of the most current version of this Code shall be posted on Columbia Sportswear Company's external website and intranet.' However, CHRB could not find further information about how it communicates its policy to all workers, including local languages where necessary. [Code of Business Conduct and Ethics, Ap 2018: investor.columbia.com] Score 2 <ul style="list-style-type: none"> • Not met: Commits to all 4 ILO core conventions: See indicator A.1.2 • Not met: Communication of policy commitments to stakeholder • Not met: How policy commitments are made accessible to audience
B.1.4.b	Communication /dissemination of policy commitment(s) to business relationships	0.5	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: See indicator A.1.2 • Not met: Communicating policy down the whole AP supply chain • Not met: Requiring AP suppliers to communicate policy down the chain: In its 'Transparency in Supply Chain Statement' document the Company states: 'CSC requires all finished goods suppliers to sign a supply agreement, which specifies that a vendor has read and understand the CSC Standards of Manufacturing Practices Policy and shall ensure that its facilities and facilities of its subcontractors are maintained in accordance with the SMP Policy Standards.' However, it is not clear how the company communicates its policy to its suppliers. [Transparency in Supply Chain 2016, 2016: columbia.com] Score 2 <ul style="list-style-type: none"> • Met: How HR commitments made binding/contractual: In its 'Transparency in Supply Chain Statement' document the Company states: 'CSC requires all finished goods suppliers to sign a supply agreement, which specifies that a vendor has read and understand the CSC Standards of Manufacturing Practices Policy and shall ensure that its facilities and facilities of its subcontractors are maintained in accordance with the SMP Policy Standards.' [Transparency in Supply Chain 2016, 2016: columbia.com] • Not met: Including on AP suppliers: See above. The Company requires its suppliers to ensure that the facilities of its subcontractors are maintained in accordance with the SMP Policy standards but there is no requirement to cascade the contractual binding down their supply chain. [Transparency in Supply Chain 2016, 2016: columbia.com]
B.1.5	Training on Human Rights	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Scores at least 1 on A.1.2: See indicator A.1.2 • Not met: Trains all workers on HR policy commitments: As indicated above, employees related to supply chain receive training. No evidence found of all employees receiving training on human rights. [Transparency in Supply Chain 2016, 2016: columbia.com] <ul style="list-style-type: none"> • Met: Trains relevant AP managers including procurement: In its Transparency in Supply Chain document, the Company indicates: 'CSC regularly trains all internal

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>supply chain management staff on slavery and human trafficking, with a particular focus on mitigating risks, to ensure they are knowledgeable and aware of the issues and concerns surrounding our supply chain. We also provide training on our SMP during new employee orientation, and offer several training on our SMP throughout the year for all CSC staff.' Its SMP document covers all ILO core. [Transparency in Supply Chain 2016, 2016: columbia.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Score of 2 on A.1.2: See indicator A.1.2 • Not met: Both requirements under score 1 met [Transparency in Supply Chain 2016, 2016: columbia.com]
B.1.6	Monitoring and corrective actions	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Scores at least 1 on A.1.2: See indicator A.1.2 • Not met: Monitoring implementation of HR policy commitments: In its Code of Business Conduct, the Company states: 'Company officers and leaders at all levels are responsible for monitoring and enforcing the Code within each of their areas of accountability. If you observe or learn of a situation which you believe may violate or lead to a violation of this Code, report the concern using the resources described in the Code.'. However, it is not clear the actual process or system to monitor compliance within own operations. [Code of Business Conduct and Ethics, Ap 2018: investor.columbia.com] • Met: Monitoring AP suppliers: "In its Transparency in Supply Chain document, the Company indicates: 'All finished goods suppliers are audited against our SMP and local law on an unannounced basis, [...]. Audits include specific criteria around risks for forced labor or human trafficking [...]. New factories are audited and must meet our minimum standards before production can begin. [...] Audits are performed by a combination of our internal CR staff as well as Columbia Sportswear authorized third party audit firms.' Company's SMP cover all ILO core. <p>In addition, in 2017 the Company maintained manufacturing liaison offices, which are direct employees of CSC and are responsible for overseeing production at its manufacturers in order to monitor factories for compliance with its policies, procedures and standards related to labor practices." [Transparency in Supply Chain 2016, 2016: columbia.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Score of 2 on A.1.2 • Not met: Describes corrective action process: In its Responsible Practices website section, the Company indicates: 'We work with the factories to develop a Corrective Action Plan to remediate issues identified during the audit. As we consider our suppliers as partners, our approach to remediation is continuous improvement, working together to improve working conditions.' However, there no further details found about the process and the number of incidences. [Responsible Practices, Feb 2019: columbia.com] • Not met: Example of corrective action • Met: Discloses % of AP supply chain monitored: In its Responsibility Report 2016, the Company reports that '95% of Columbia factories received at least one unannounced social compliance audit'. [Corporate Responsibility Report Update 2016, 2016: columbia.com]
B.1.7	Engaging business relationships	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: HR affects AP selection of suppliers: In its Transparency in Supply Chain document, the Company indicates: ' New factories are audited and must meet our minimum standards before production can begin. A re-audit will occur anywhere from 30 days to one year later, depending on the findings in the previous audit.' It also states that: 'We maintain and enforce internal accountability procedures for employees and contractors regarding company standards around slavery and human trafficking. Inthe case of non-compliance, we reserve the right to examine the specific situation and develop the best possible strategy for resolution. If cases of non-compliance are not resolved within a timely manner, we may terminate the business relationship.' [Transparency in Supply Chain 2016, 2016: columbia.com] • Met: HR affects on-going AP supplier relationships: See above <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirement under score 1 met: See above • Not met: Working with AP suppliers to improve performance: Although the Company indicates that works in corrective action plans, no evidence found on proactive work carried out with suppliers to improve their performance, including examples. [Responsible Practices, Feb 2019: columbia.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.8	Approach to engagement with potentially affected stakeholders	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Stakeholder process or systems: In its website section 'Responsible Practices', the Company indicates: 'We select organizations for investment and engagement based on their ability to influence systemic change and their relevance to our business and supply chain. We also seek to work directly with other brands and retailers who share our values and whose products are made in the same factories as ours.' The Company engages or collaborates with the following organisations: Outdoor Industry Association, Sustainable Apparel Coalition, Fair Labor Association, International Labor Organization, Business for Social Responsibility's HERproject, American Apparel & Footwear Association and Footwear Distributors and Retailers of America. However, there is no further information about how it identifies and engages with affected and potentially affected stakeholders, including frequency and triggers for engagement on human rights issues. [Responsible Practices, Feb 2019: columbia.com] • Not met: Frequency and triggers for engagement: See above • Not met: Workers in AP SC engaged: See above • Not met: Communities in the AP SC engaged: See above <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Analysis of stakeholder views and company's actions on them

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.1	Identifying: Processes and triggers for identifying human rights risks and impacts	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: Identifying risks in own operations • Not met: Identifying risks in AP suppliers <p>Score 2</p> <ul style="list-style-type: none"> • 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
B.2.2	Assessing: Assessment of risks and impacts identified (salient risks and key industry risks)	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: Salient risk assessment (and context): In its 'Transparency in Supply Chain Statement' document the Company indicates: 'CSC assesses the risks related to our apparel, footwear, accessories and equipment supply chains at the country, vendor and factory levels. Risk assessment is performed internally by our sourcing, legal and corporate responsibility teams on a regular basis. We recognize our industry has a risk of human trafficking in the form of migrant workers; in 2017 we began work to strengthen our migrant worker policy, and will begin additional migrant worker due diligence in 2018'. [Transparency in Supply Chain 2016, 2016: columbia.com] • Not met: Public disclosure of salient risks <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met
B.2.3	Integrating and Acting: Integrating assessment findings internally and taking appropriate action	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Action Plans to mitigate risks: In its 'Transparency in Supply Chain Statement' document the Company indicates: 'We recognize our industry has a risk of human trafficking in the form of migrant workers; in 2017 we began work to strengthen our migrant worker policy, and will begin additional migrant worker due diligence in 2018'. However there is no information about a system put in place to take action to prevent, mitigate or remediate its salient human rights issues. [Transparency in Supply Chain 2016, 2016: columbia.com] • Not met: Including in AP supply chain • Not met: Example of Actions decided <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	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 • 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

Indicator Code	Indicator name	Score (out of 2)	Explanation
	risks and impacts		
B.2.5	Communicating : Accounting for how human rights impacts are addressed	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: Comms plan re identifying risks: See indicator B.2.1 • Not met: Comms plan re assessing risks: See indicator B.2.2 • Not met: Comms plan re action plans for risks: See indicator B.2.3 • Not met: Comms plan re reviewing action plans: See indicator B.2.4 • Not met: Including AP suppliers <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Responding to affected stakeholders concerns • Not met: Ensuring affected stakeholders can access communications

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.1	Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers	1.5	<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: Channel accessible to all workers: "In its Code of Business Conduct, the Company refers to different channels to raise a complaint or concern or to report any violation of the Code. One of this channels is the Compliance Line which 'offers two easy options for you to report ethics and compliance concerns via phone or online'. [Code of Business Conduct and Ethics, Ap 2018: investor.columbia.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Number grievances filed, addressed or resolved • Met: Channel is available in all appropriate languages: In addition, it indicates: ' If you would like to make a report in your local language, we encourage you to use the toll-free phone option to ensure our Ethics & Compliance team receives as accurate a translation as possible. Our reporting solution also offers the option to display the report form in your preferred language' (there are more than 55 languages available in the Compliance Line website) [Code of Business Conduct and Ethics, Ap 2018: investor.columbia.com] • Not met: Expect AP supplier to have equivalent grievance systems • Met: Opens own system to AP supplier workers: In its Standards of Manufacturing Practices the Company indicates: 'To report a violation of these Standards, please contact: SMP@Columbia.com'. [Standards of Manufacturing Practices, 2018: columbia.com]
C.2	Grievance channel(s)/mechanism(s) to receive complaints or concerns from external individuals and communities	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Grievance mechanism for community <p>Score 2</p> <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	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Engages users to create or assess system • Not met: Description of how they do this <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Engages with users on system performance • Not met: Provides user engagement example on performance • Not met: AP suppliers consult users in creation or assessment
C.4	Procedures related to the mechanism(s)/channel(s) are publicly available and explained	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Response timescales • Not met: How complainants will be informed <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Escalation to senior/independent level
C.5	Commitment to non-retaliation over complaints or concerns made	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: Public statement prohibiting retaliation: In its Code of Business Conduct, the Company states: 'We do not tolerate retaliation against anyone who raises a compliance concern in good faith or participates in an internal investigation. Employees who retaliate or attempt to retaliate against anyone who reports a

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>concern in good faith or participates in an internal investigation are subject to discipline up to and including termination of employment. Employees who believe they have experienced retaliation for raising a compliance related concern should report it immediately using the resources defined in the Code.' [Code of Business Conduct and Ethics, Ap 2018: investor.columbia.com]</p> <ul style="list-style-type: none"> • Met: Practical measures to prevent retaliation: See above. In addition, according to its Code of Business Conduct anonymous reporting is available in its Compliance Line where allowed by law: 'In some locations local law restricts the types of reports that may be made anonymously. If you are making a report from a location where anonymous reporting is limited, you will be asked to provide your name or you may raise your concern directly with management.' Also, in any case, as indicated above, retaliation can be penalised with disciplinary action and termination of employment'. [Code of Business Conduct and Ethics, Ap 2018: investor.columbia.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Has not retaliated in practice • Not met: Expects AP suppliers to prohibit retaliation
C.6	Company involvement with State-based judicial and non-judicial grievance mechanisms	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Won't impede state based mechanisms • Not met: Complainants not asked to waive rights <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Will work with state based or non judicial mechanisms • Not met: Example of issue resolved (if applicable)
C.7	Remedying adverse impacts and incorporating lessons learned	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Describes how remedy has been provided • Not met: Says how it would remedy key sector risks <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Changes introduced to stop repetition • Not met: Approach to learning from incident to prevent future impacts • Not met: Evaluation of the channel/mechanism

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.2.1.b	Living wage (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: Living wage in supplier code or contracts: In its SMP, the Company indicates: 'Every worker has a right to compensation for a regular work week that is sufficient to meet the worker's basic needs and provide some discretionary income.' However, there is no mention any reference to family and/or dependents. [Standards of Manufacturing Practices, 2018: columbia.com] • Not met: Improving living wage practices of suppliers: In addition, it indicates: 'Where compensation does not meet workers' basic needs and provide some discretionary income, each employer shall work with CSC to take appropriate actions that seek to progressively realize a level of compensation that does.' However, no specific evidence found of the Company working with suppliers to improve living wage practices. [Standards of Manufacturing Practices, 2018: columbia.com] <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 • Not met: Positive incentives to respect human rights <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.2.3	Mapping and disclosing the supply chain	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Identifies suppliers back to product source: In its Corporate Responsibility Report 2015, the Company states: 'At Columbia, supply chain transparency means being able to track where our products are made, as well as the social and environmental conditions at specific supplier locations.' However, there is only reference to finished goods suppliers, it is not clear whether the mapping includes all direct and indirect suppliers. [Corporate Responsibility Report 2015, 2015: columbia.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Discloses significant parts of supply chain and why: In its website section 'Transparency Map', the Company states: 'Columbia values transparency in our supply chain and we have been publicly reporting our finished goods factory list since 2013. The Columbia Factory Transparency Map provides visibility to where Columbia Sportswear Company (including Columbia, MHW, Sorel) products are made.' The Transparency Map include the name and location of Columbia's finished goods factories. [Transparency Map, Feb 2019: columbia.com]
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: In its SMP the Company indicates: 'Supplier must only employ people who (a) meet the local legal minimum age for employment, (b) meet the age for completing compulsory education in the country of manufacture, or (c) are at least 15 years old, whichever is higher.' However there are no further guidelines, including verifying the age of job applicants and workers and remediation programmes. [Standards of Manufacturing Practices, 2018: columbia.com] • Not met: How working with suppliers on child labour <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met: See above • 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)	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: Debt and fees rules in codes or contracts: In its SMP the Company indicates: 'Supplier must not use forced labor, whether in the form of prison, indentured, slave, bonded, trafficked or any other form of compulsory labor. [...] Supplier must also provide employees with a clear written accounting for every pay period and must not deduct or withhold wages or benefits for disciplinary infractions.' However, there is no reference to specific debt bondage guidelines, including refraining from imposing any financial burdens on workers by withholding expenses including recruitment fees and related recruitment costs. [Standards of Manufacturing Practices, 2018: columbia.com] • Not met: How working with suppliers on debt & fees <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met: See above • Not met: Provide analysis of trends in progress made
D.2.5.d	Prohibition on forced labour: Restrictions on workers (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: Free movement rules in codes or contracts • Not met: How these practices are implemented and monitored for agencies, labour brokers or recruiters <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
D.2.6.b	Freedom of association and collective bargaining (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: FoA & CB rules in codes or contracts: In its SMP (included in the contractual arrangement with its suppliers) the Company indicates: 'Supplier must recognize and respect the right of employees to associate, organize and bargain collectively. Where the right to freedom of association and collective bargaining is restricted under law, the supplier allows the development of parallel means for independent and free association and bargaining. [...] Supplier must treat all employees with respect and provide work environments that are free of physical, sexual, psychological and verbal harassment and abuse, retribution for grievances, and corporal punishment.' However, there is no guidelines which include the prohibition of intimidation, harassment, retaliation and violence against union members and union representatives. [Standards of Manufacturing Practices, 2018: columbia.com] • Not met: How working with suppliers on FoA and CB

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met: See above • 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)	0.5	<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: Sets out clear Health and Safety requirements: In its SMP the Company indicates: 'Suppliers must provide a safe and healthy workplace setting to prevent accidents and injury to health arising out of, linked with, or occurring in the course of work or as a result of the operation of suppliers' facilities. Supplier must comply with all applicable laws and regulations and CSC health & safety standards regarding working conditions, including any housing and cafeteria requirements.' [Standards of Manufacturing Practices, 2018: columbia.com] • Not met: Injury rate disclosures • Not met: Lost days or near miss disclosures • Not met: Fatalities disclosures <p>Score 2</p> <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)	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: Women's rights in codes or contracts • Met: How working with suppliers on women's rights: In its website section 'Empowering People' the Company indicates: 'Women represent 75% of Columbia's finished good factory workforce and we're committed to finding ways to empower them to improve their lives. Ten years ago, we began a partnership with Business for Social Responsibility to implement HERproject™ training in our factories around the world. A multifaceted educational program, HERproject™ provides training in women's health, financial literacy, and gender equality. We've implemented HERproject™ at our finished goods suppliers in Vietnam, India, China, and Bangladesh, with more programs to come. To date, we've helped 30,000 women unlock their full potential.' [Empowering people, Feb 2019: columbia.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirement under score 1 met: See above • Not met: Provide analysis of trends in progress made
D.2.9.b	Working hours (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: Working hours in codes or contracts: In its SMP the Company indicates: 'Supplier must not require workers to work more than the regular and overtime hours allowed by the law of the country where the workers are employed. The regular work week shall not exceed 48 hours; other than in exceptional circumstances, the sum of regular and overtime hours in a week shall not exceed 60 hours. Supplier must allow workers at least 24 consecutive hours of rest in every seven-day period. All overtime work shall be consensual. Supplier must not request overtime on a regular basis and shall compensate all overtime work at a premium rate.' However, it seems that under "exceptional circumstances", employees working hours can exceed 60 hours. [Standards of Manufacturing Practices, 2018: columbia.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: See above • 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: Report finds female migrant workers are subjected to conditions of modern slavery in factories supplying to many brands • Area: Forced labour - restriction of movement • Story: On February 28, 2018, the Business & Human Rights Resource Centre website reported that according to a study conducted by the India Committee of the Netherlands, Clean Clothes Campaign and Garment Labour Union, that looks into the living conditions in Bangalore garment factory hostels and the particular challenges migrant workers face. It is found that five out of the eleven ILO (International Labour Organization) indicators for forced labour exists in the Bangalore garment industry: abuse of vulnerability, deception as a result of false promises (wages etc.), restriction of movement in the hostel, intimidation and threats, and abusive working and living conditions. The report identifies two companies, Company 1 & Company 3 as supplying a number of major fashion brands, including Columbia Sportswear. Connected to these Companies are 'hostels', living quarters for workers located nearby the factory they work at. Women who lived at these hostels complained that their movement was restricted by the factory employees and hostel authorities. At Company 1 the women were escorted from the factory back to the hostel in the afternoon and were banned from leaving the hostel during weekday evenings. On Sunday's they were allowed to leave the hostel unaccompanied, however this was only between the hours of 4pm to 7pm. At Company 3, women were only allowed to leave the hostel for a total of 3 hours on Sunday, between 12pm and 7pm, on all other days they had to be back inside the hostel by 7pm. Additionally, hostel authorities would not allow the families of the women to enter the hostel when they came to visit, and the use of mobile phones was only permitted between 8.30pm - 9.30pm at night. While some of these aspects are also felt by the local workforce, they are more strongly experienced by migrant workers. According to the report, the factories studied produce for C&A, Columbia, Decathlon, Gap, H&M, PVH, Marks & Spencer, Abercrombie & Fitch, Benetton and Levi Strauss. • Sources: [Business & Human Rights Resource Centre - 28/02/2018: business-humanrights.org][Clean Clothes Campaign - 26/01/2018: cleanclothes.org]
E(1).1	The Company has responded publicly to the allegation	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: Public response available: The company provides a response on the BHRRC website where it acknowledges the allegations and also outlines the steps taken to address the issues raised through amendments to policies and procedures. <p>Score 2</p> <ul style="list-style-type: none"> • Met: Response goes into detail: The company responds in detail, outlining specific changes it has made to its policies and also auditing procedures.
E(1).2	The Company has appropriate policies in place	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: Company policies address the general issues raised: The company says "We respect and protect human rights and we are committed to decent and humane working conditions. We do not tolerate any conduct that contributes to, encourages or facilitates human trafficking, child labor, forced or compulsory labor, or any other human rights abuses. This is true not only for our own workforce, but also for the employees of the manufacturers we contract with around the world" [Code of Business Conduct and Ethics, Ap 2018: investor.columbia.com] • Met: Policies apply to the type of business relationships involved: The company says in its 'Standards of Manufacturing Practices', "Whether we (or our subsidiaries, divisions, affiliates or agents) enter into or continue a business relationship with a particular supplier depends in part on its compliance with and commitment to the principles outlined in these Standards. When differences or conflicts in standards arise, the highest standard shall apply." [Standards of Manufacturing Practices, 2018: columbia.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Policies address the specific rights in question: The company has policies addressing forced labour issues, however there is nothing in relation to guaranteeing the freedom of movement of employees, which the allegations relate to. [Code of Business Conduct and Ethics, Ap 2018: investor.columbia.com]
E(1).3	The Company has taken appropriate action	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"> • Not met: Engages with affected stakeholders: The company said in its response, "We have reviewed the report with our factory partners in the Bangalore area will continue to focus on these issues as we work with this group of factories in this

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>region." However, this does not indicate that they engaged with the women who were affected or similar type (women in the same working and living conditions in the same region) [Columbia response to Bangalore allegations, 18/02/2018: business-humanrights.org]</p> <ul style="list-style-type: none"> • Met: Encourages linked business to engage affected stakeholders: The company said in its response, "Before and after the publication of this report, Columbia has been actively engaging with a group of other brands sourcing in the Bangalore area to collaborate on resolving the issues that the report outlines. This group of brands has met with Bangalore factories to directly discuss conditions in their owned and operated factories and to address the issue of intra-country migrant workers." [Columbia response to Bangalore allegations, 18/02/2018: business-humanrights.org] • Not met: Provides remedies to affected stakeholders: The company said in its response "Specific suppliers and exact factory locations are not outlined by the authors of this report, therefore it is difficult to completely validate the issues outlined, as well as take remediation actions with our suppliers at specific locations". Since they cannot remedy those women as they cannot locate them, CHRB awards these points. [Columbia response to Bangalore allegations, 18/02/2018: business-humanrights.org] • Met: Has reviewed management systems to prevent recurrence: The company said in its response, "Columbia is amending our Migrant Worker Policy to specifically include intrastate migrants. We have also amended our policy to insure that suppliers who facilitate finding off-site accommodations which are not owned or operated by the supplier have a policy and a due diligence process to insure that these facilities are safe and hygienic." [Columbia response to Bangalore allegations, 18/02/2018: business-humanrights.org] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Remedies are satisfactory to the victims: The company said in its response "Specific suppliers and exact factory locations are not outlined by the authors of this report, therefore it is difficult to completely validate the issues outlined, as well as take remediation actions with our suppliers at specific locations". Since they cannot remedy those women as they cannot locate them, CHRB awards these points. [Columbia response to Bangalore allegations, 18/02/2018: business-humanrights.org] • Not met: Has improved systems and engaged affected stakeholders: The company says "We have also amended our policy to insure that suppliers who facilitate finding off-site accommodations which are not owned or operated by the supplier have a policy and a due diligence process to insure that these facilities are safe and hygienic... Columbia has been actively engaging with a group of other brands sourcing in the Bangalore area to collaborate on resolving the issues that the report outlines. This group of brands has met with Bangalore factories to directly discuss conditions in their owned and operated factories and to address the issue of intra-country migrant workers." However, they engaged with the women who were affected or similar type (women in the same working and living conditions in the same region) [Columbia response to Bangalore allegations, 18/02/2018: business-humanrights.org]
E(2).0	Serious allegation No 2		<ul style="list-style-type: none"> • Headline: Shahi Exports, a supplier of Columbia Sportswear, accused of unfair practices • Area: FoA&CB • Story: In June 2018, Worker Rights Consortium (WRC), a US based labour rights monitoring organisation focused on protecting the rights of workers, reported allegations of violent anti-union activity at a Shahi Exports factory in Bangalore, India. WRC exposed its allegations in a 29 page report which included accusations that the mid-level professionals of Shahi Exports house were behind threats and misbehaviour targeting the workers who were demanding a salary increase. A WRC investigation found that in late March through mid-April 2018, the management of Shahi Exports engaged in a campaign of vicious repression and retaliation against workers exercising their fundamental labour rights. The repression and retaliation included physical beatings; death threats; gender, caste, and religion-based abuse; threats of mass termination; and the expulsion from the factory of 15 worker activists. The violations occurred at Shahi's Unit 8 factor and were allegedly a deliberate effort by Shahi to repress the organisation of a union at the factory as well as prevent an increase in garment workers' wages, reported WRC. Initially, WRC called on Shahi to fire the managers involved, reinstate the workers and recognise the union. However, when Shahi denied the accusations targeting its managers and refused to fire them, the WRC urged Shahi's major international client including H&M, Benetton, Abercrombie & Fitch

Indicator Code	Indicator name	Score (out of 2)	Explanation
			and Columbia Sportswear to press Shahi to fire the managers and apologise to the 15 workers. <ul style="list-style-type: none"> Sources: [WRC Website - 20/6/2018: workersrights.org][The Guardian - 19/07/2018: theguardian.com][Apparel Resources - 25/06/2018: apparelresources.com]
E(2).1	The Company has responded publicly to the allegation	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Met: Public response available: Columbia Sportswear acknowledged the allegations of violations of fair labour practices at the Shahi factory. [H&M, Columbia, and others are accused of ignoring disturbing abuses at a large Indian supplier, 25/6/2018: qz.com] Score 2 <ul style="list-style-type: none"> Not met: Response goes into detail: The company has not responded to each allegation in detail. [H&M, Columbia, and others are accused of ignoring disturbing abuses at a large Indian supplier, 25/6/2018: qz.com]
E(2).2	The Company has appropriate policies in place	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: Company policies address the general issues raised: Columbia Sportswear does not appear to commit to respect freedom of association and collective bargaining for its own employees. [Code of Business Conduct and Ethics, Ap 2018: investor.columbia.com] Met: Policies apply to the type of business relationships involved: Columbia Sportswear requires its suppliers to "recognize and respect the right of employees to associate, organize and bargain collectively in a lawful and peaceful manner without penalty or interference. Where the right to freedom of association and collective bargaining is restricted under law, the employer shall consider the development of parallel means for independent and free association and bargaining." [Standards of Manufacturing Practices, 2018: columbia.com] Score 2 <ul style="list-style-type: none"> Not met: Policies address the specific rights in question
E(2).3	The Company has taken appropriate action	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Met: Encourages linked business to engage affected stakeholders: In Columbia Sportswear's response to the allegations, it stated the following: "We have insisted that Shahi management take immediate action to address the situation, including: reinstate suspended workers, pay medical expenses of workers, return any personal property of workers, engage in constructive and meaningful engagement with the union, and discipline any employees that are found to have engaged in violence or acts of discrimination. We have also insisted that Shahi formally and publicly reconfirm their commitment to freedom of association and to maintaining a safe and non-discriminatory workplace. We understand that the people who have been accused of violence have been suspended pending investigation. We have required Shahi to undertake these actions immediately and we will monitor progress with weekly meetings. If meaningful and prompt progress is not made toward meeting these requirements, we will take necessary steps, including reducing or ceasing production in the factory." [H&M, Columbia, and others are accused of ignoring disturbing abuses at a large Indian supplier, 25/6/2018: qz.com] Not met: Provides remedies to affected stakeholders: There is no evidence that Columbia Sportswear has provided remedies to affected stakeholders. Not met: Has reviewed management systems to prevent recurrence: There is no evidence that Columbia Sportswear has reviewed management systems to prevent recurrence. Score 2 <ul style="list-style-type: none"> Not met: Remedies are satisfactory to the victims: There is no evidence that Columbia Sportswear has provided remedies to the victims. Not met: Has improved systems and engaged affected stakeholders: There is no evidence that Columbia Sportswear has improved systems and engaged with affected stakeholders.

F. Transparency (10% of Total)

Indicator Code	Indicator name	Score	Explanation
F.1	Company willingness to publish information	1.4 out of 4	Out of a total of 40 indicators assessed under sections A-D of the benchmark, Columbia Sportswear made data public that met one or more elements of the methodology in 14 cases, leading to a disclosure score of 1.4 out of 4 points.

Indicator Code	Indicator name	Score	Explanation
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	Columbia Sportswear met 0 of the 8 thresholds listed below and therefore gets 0 out of 4 points for the high quality disclosure indicator. Specificity and use of concrete examples <ul style="list-style-type: none"> • Not met: Score 2 for A.2.2 : Board discussions • Not met: Score 2 for B.1.6 : Monitoring and corrective actions • Not met: Score 2 for C.1 : Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers • Not met: Score 2 for C.3 : Users are involved in the design and performance of the channel(s)/mechanism(s) Discussing challenges openly <ul style="list-style-type: none"> • Not met: Score 2 for B.2.4 : Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts • Not met: Score 2 for C.7 : Remedying adverse impacts and incorporating lessons learned Demonstrating a forward focus <ul style="list-style-type: none"> • Not met: Score 2 for A.2.3 : Incentives and performance management • Not met: Score 2 for B.1.2 : Incentives and performance management

Disclaimer

A score of zero for a particular indicator does not mean that bad practices are present. Rather it means that we have been unable to identify the required information in public documentation.

See the 2019 Key Findings report and technical annex for more details of the research process.

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As CHRB Ltd, we want to emphasise that the results will always be a proxy for good human rights management, and not an absolute measure of performance. This is because there are no fundamental units of measurement for human rights. Human rights assessments are therefore necessarily more subjective than objective. The Benchmark also captures only a snap shot in time. We therefore want to encourage companies, investors, civil society and governments to look at the broad performance bands that companies are ranked within rather than their precise score because, as with all measurements, there is a reasonably wide margin of error possible in interpretation. We also want to encourage a greater analytical focus on how scores improve over time rather than upon how a company compares to other companies in the same industry today. The spirit of the exercise is to promote

continual improvement via an open assessment process and a common understanding of the importance of the UN Guiding Principles on Business and Human Rights.