### Detailed assessment

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

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

<table>
<thead>
<tr>
<th>Indicator Code</th>
<th>Indicator name</th>
<th>Score (out of 2)</th>
<th>Explanation</th>
</tr>
</thead>
</table>
| A.1.1          | Commitment to respect human rights | 0               | The individual elements of the assessment are met or not as follows: Score 1  
- Not met: General HRs commitment  
- Not met: UNGC principles 1 & 2  
- Not met: UDHR  
- Not met: International Bill of Rights Score 2  
- Not met: UNGPs  
- Not met: OECD |
| A.1.2          | Commitment to respect the human rights of workers | 0               | The individual elements of the assessment are met or not as follows: Score 1  
- Not met: ILO Core  
- Not met: UNGC principles 3-6  
- Not met: Explicitly list ALL four ILO for AP suppliers Score 2  
- Not met: Explicit commitment to All four ILO Core  
- Not met: Respect H&S of workers  
- Not met: H&S applies to AP suppliers  
- Not met: working hours for workers  
- Not met: Working hours for AP suppliers |
| A.1.3.AP       | Commitment to respect human rights particularly | 0               | The individual elements of the assessment are met or not as follows: Score 1  
- Not met: Women's Rights  
- Not met: Children's Rights |
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</table>
| relevant to the industry (AP) | | | • Not met: Migrant worker’s rights  
• Not met: Expecting suppliers to respect these rights  
Score 2  
• 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  
• Not met: Expecting suppliers to respect these rights |
| A.1.4 | Commitment to engage with stakeholders | 0 | The individual elements of the assessment are met or not as follows:  
Score 1  
• Not met: Commits to stakeholder engagement  
• Not met: Regular stakeholder engagement  
Score 2  
• Not met: Commits to engage stakeholders in design  
• Not met: Regular stakeholder design engagement |
| A.1.5 | Commitment to remedy | 0 | The individual elements of the assessment are met or not as follows:  
Score 1  
• Not met: Commits to remedy  
Score 2  
• 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 | The individual elements of the assessment are met or not as follows:  
Score 1  
• Not met: Zero tolerance attacks on HRs Defenders (HRDs)  
Score 2  
• Not met: Expects AP suppliers to reflect company HRD commitments |

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

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</table>
| A.2.1 | Commitment from the top | 0 | The individual elements of the assessment are met or not as follows:  
Score 1  
• Not met: CEO or Board approves policy  
• Not met: Board level responsibility for HRs  
Score 2  
• Not met: Speeches/letters by Board members or CEO |
| A.2.2 | Board discussions | 0 | The individual elements of the assessment are met or not as follows:  
Score 1  
• Not met: Board/Committee review of salient HRs  
• Not met: Examples or trends re HR discussion  
Score 2  
• Not met: Both examples and process |
| A.2.3 | Incentives and performance management | 0 | The individual elements of the assessment are met or not as follows:  
Score 1  
• Not met: Incentives for at least one board member  
• Not met: At least one key AP HR risk, beyond employee H&S  
Score 2  
• Not met: Performance criteria made public |

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

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

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<thead>
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</table>
| B.1.1 | Responsibility and resources for day-to-day human rights functions | 0 | The individual elements of the assessment are met or not as follows:  
Score 1  
• Not met: Commits to ILO core conventions  
• Not met: Senior responsibility for HR  
Score 2  
• Not met: Day-to-day responsibility  
• Not met: Day-to-day responsibility for AP in supply chain |
| B.1.2 | Incentives and performance management | 0 | The individual elements of the assessment are met or not as follows:  
Score 1  
• Not met: Senior manager incentives for human rights  
• Not met: At least one key AP HR risk, beyond employee H&S  
Score 2  
• Not met: Performance criteria made public |
<table>
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</table>
| B.1.3          | Integration with enterprise risk management | 0 | The individual elements of the assessment are met or not as follows:  
|                |                |                  | Score 1  
|                |                |                  | • Not met: HR risks is integrated as part of enterprise risk system  
|                |                |                  | Score 2  
|                |                |                  | • 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  
|                |                |                  | • Not met: Commits to ILO core conventions  
|                |                |                  | • Not met: Communicates its policy to all workers in own operations  
|                |                |                  | Score 2  
|                |                |                  | • Not met: Commits to all 4 ILO core conventions  
|                |                |                  | • Not met: Communication of policy commitments to stakeholder  
|                |                |                  | • Not met: How policy commitments are made accessible to audience |
| B.1.4.b        | Communication /dissemination of policy commitment(s) to business relationships | 0 | The individual elements of the assessment are met or not as follows:  
|                |                |                  | Score 1  
|                |                |                  | • Not met: Commits to all 4 ILO core conventions for suppliers  
|                |                |                  | • Not met: Communicating policy down the whole AP supply chain  
|                |                |                  | • Not met: Requiring AP suppliers to communicate policy down the chain  
|                |                |                  | Score 2  
|                |                |                  | • Not met: How HR commitments made binding/contractual  
|                |                |                  | • Not met: Including on AP suppliers |
| B.1.5          | Training on Human Rights | 0 | The individual elements of the assessment are met or not as follows:  
|                |                |                  | Score 1  
|                |                |                  | • Not met: Scores at least 1 on A.1.2  
|                |                |                  | • Not met: Trains all workers on HR policy commitments  
|                |                |                  | • Not met: Trains relevant AP managers including procurement  
|                |                |                  | Score 2  
|                |                |                  | • Not met: Score of 2 on A.1.2  
|                |                |                  | • Not met: Both requirements under score 1 met |
| B.1.6          | Monitoring and corrective actions | 0 | The individual elements of the assessment are met or not as follows:  
|                |                |                  | Score 1  
|                |                |                  | • Not met: Scores at least 1 on A.1.2  
|                |                |                  | • Not met: Monitoring implementation of HR policy commitments  
|                |                |                  | • Not met: Monitoring AP suppliers  
|                |                |                  | Score 2  
|                |                |                  | • Not met: Score of 2 on A.1.2  
|                |                |                  | • Not met: Describes corrective action process  
|                |                |                  | • Not met: Example of corrective action  
|                |                |                  | • Not met: Discloses % of AP supply chain monitored |
| B.1.7          | Engaging business relationships | 0 | The individual elements of the assessment are met or not as follows:  
|                |                |                  | Score 1  
|                |                |                  | • Not met: HR affects AP selection of suppliers  
|                |                |                  | • Not met: HR affects on-going AP supplier relationships  
|                |                |                  | Score 2  
|                |                |                  | • Not met: Both requirement under score 1 met  
|                |                |                  | • Not met: Working with AP suppliers to improve performance |
| 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  
|                |                |                  | • Not met: Stakeholder process or systems  
|                |                |                  | • Not met: Frequency and triggers for engagement  
|                |                |                  | • Not met: Workers in AP SC engaged  
|                |                |                  | • Not met: Communities in the AP SC engaged  
|                |                |                  | Score 2  
<p>|                |                |                  | • Not met: Analysis of stakeholder views and company’s actions on them |
| <strong>B.2 Human Rights Due Diligence (15% of Total)</strong> | | | |</p>
<table>
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</thead>
<tbody>
<tr>
<td>B.2.2</td>
<td>Assessing: Assessment of risks and impacts identified (salient risks and key industry risks)</td>
<td>0</td>
<td>The individual elements of the assessment are met or not as follows: Score 1  • Not met: Salient risk assessment (and context)  • Not met: Public disclosure of salient risks Score 2  • Not met: Both requirements under score 1 met</td>
</tr>
<tr>
<td>B.2.3</td>
<td>Integrating and Acting: Integrating assessment findings internally and taking appropriate action</td>
<td>0</td>
<td>The individual elements of the assessment are met or not as follows: Score 1  • Not met: Action Plans to mitigate risks  • Not met: Including in AP supply chain  • Not met: Example of Actions decided Score 2  • Not met: Both requirements under score 1 met</td>
</tr>
<tr>
<td>B.2.4</td>
<td>Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts</td>
<td>0</td>
<td>The individual elements of the assessment are met or not as follows: Score 1  • Not met: System to check if Actions are effective  • Not met: Lessons learnt from checking effectiveness Score 2  • Not met: Both requirement under score 1 met</td>
</tr>
<tr>
<td>B.2.5</td>
<td>Communicating: Accounting for how human rights impacts are addressed</td>
<td>0</td>
<td>The individual elements of the assessment are met or not as follows: Score 1  • Not met: Comms plan re identifying risks  • Not met: Comms plan re assessing risks  • Not met: Comms plan re action plans for risks  • Not met: Comms plan re reviewing action plans  • Not met: Including AP suppliers Score 2  • Not met: Responding to affected stakeholders concerns  • Not met: Ensuring affected stakeholders can access communications</td>
</tr>
</tbody>
</table>

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

<table>
<thead>
<tr>
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<th>Score (out of 2)</th>
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</tr>
</thead>
<tbody>
<tr>
<td>C.1</td>
<td>Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers</td>
<td>0</td>
<td>The individual elements of the assessment are met or not as follows: Score 1  • Not met: Channel accessible to all workers Score 2  • Not met: Number grievances filed, addressed or resolved  • Not met: Channel is available in all appropriate languages  • Not met: Expect AP supplier to have equivalent grievance systems  • Not met: Opens own system to AP supplier workers</td>
</tr>
<tr>
<td>C.2</td>
<td>Grievance channel(s)/mechanism(s) to receive complaints or concerns from external individuals and communities</td>
<td>0</td>
<td>The individual elements of the assessment are met or not as follows: Score 1  • Not met: Grievance mechanism for community Score 2  • 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</td>
</tr>
<tr>
<td>C.3</td>
<td>Users are involved in the design and performance of the channel(s)/mechanism(s)</td>
<td>0</td>
<td>The individual elements of the assessment are met or not as follows: Score 1  • Not met: Engages users to create or assess system  • Not met: Description of how they do this Score 2  • Not met: Engages with users on system performance  • Not met: Provides user engagement example on performance  • Not met: AP suppliers consult users in creation or assessment</td>
</tr>
<tr>
<td>Indicator Code</td>
<td>Indicator name</td>
<td>Score (out of 2)</td>
<td>Explanation</td>
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<tr>
<td>C.4</td>
<td>Procedures related to the mechanism(s)/channel(s) are publicly available and explained</td>
<td>0</td>
<td>The individual elements of the assessment are met or not as follows: Score 1 • Not met: Response timescales • Not met: How complainants will be informed Score 2 • Not met: Escalation to senior/independent level</td>
</tr>
<tr>
<td>C.5</td>
<td>Commitment to non-retaliation over complaints or concerns made</td>
<td>0</td>
<td>The individual elements of the assessment are met or not as follows: Score 1 • Not met: Public statement prohibiting retaliation • Not met: Practical measures to prevent retaliation Score 2 • Not met: Has not retaliated in practice • Not met: Expects AP suppliers to prohibit retaliation</td>
</tr>
<tr>
<td>C.6</td>
<td>Company involvement with State-based judicial and non-judicial grievance mechanisms</td>
<td>0</td>
<td>The individual elements of the assessment are met or not as follows: Score 1 • Not met: Won’t impede state based mechanisms • Not met: Complainants not asked to waive rights Score 2 • Not met: Will work with state based or non judicial mechanisms • Not met: Example of issue resolved (if applicable)</td>
</tr>
<tr>
<td>C.7</td>
<td>Remediying adverse impacts and incorporating lessons learned</td>
<td>0</td>
<td>The individual elements of the assessment are met or not as follows: Score 1 • Not met: Describes how remedy has been provided • Not met: Says how it would remedy key sector risks Score 2 • Not met: Changes introduced to stop repetition • Not met: Approach to learning from incident to prevent future impacts • Not met: Evaluation of the channel/mechanism</td>
</tr>
<tr>
<td><strong>D. Performance: Company Human Rights Practices (20% of Total)</strong></td>
<td></td>
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<tr>
<td>Indicator Code</td>
<td>Indicator name</td>
<td>Score (out of 2)</td>
<td>Explanation</td>
</tr>
<tr>
<td>D.2.1.b</td>
<td>Living wage (in the supply chain)</td>
<td>0</td>
<td>The individual elements of the assessment are met or not as follows: Score 1 • Not met: Living wage in supplier code or contracts • Not met: Improving living wage practices of suppliers Score 2 • Not met: Both requirements under score 1 met • Not met: Provide analysis of trends demonstrating progress</td>
</tr>
<tr>
<td>D.2.2</td>
<td>Aligning purchasing decisions with human rights</td>
<td>0</td>
<td>The individual elements of the assessment are met or not as follows: Score 1 • Not met: Avoids business model pressure on HRs • Not met: Positive incentives to respect human rights Score 2 • Not met: Both requirements under score 1 met</td>
</tr>
<tr>
<td>D.2.3</td>
<td>Mapping and disclosing the supply chain</td>
<td>0</td>
<td>The individual elements of the assessment are met or not as follows: Score 1 • Not met: Identifies suppliers back to product source Score 2 • Not met: Discloses significant parts of supply chain and why</td>
</tr>
<tr>
<td>D.2.4.b</td>
<td>Prohibition on child labour: Age verification and corrective actions (in the supply chain)</td>
<td>0</td>
<td>The individual elements of the assessment are met or not as follows: Score 1 • Not met: Child Labour rules in codes or contracts • Not met: How working with suppliers on child labour Score 2 • Not met: Both requirements under score 1 met • Not met: Provide analysis of trends demonstrating progress</td>
</tr>
<tr>
<td>Indicator Code</td>
<td>Indicator name</td>
<td>Score (out of 2)</td>
<td>Explanation</td>
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<tr>
<td>D.2.5.b</td>
<td>Prohibition on forced labour: Debt bondage and other unacceptable financial costs (in the supply chain)</td>
<td>0</td>
<td>The individual elements of the assessment are met or not as follows: Score 1 • Not met: Debt and fees rules in codes or contracts • Not met: How working with suppliers on debt &amp; fees Score 2 • Not met: Both requirements under score 1 met • Not met: Provide analysis of trends in progress made</td>
</tr>
<tr>
<td>D.2.5.d</td>
<td>Prohibition on forced labour: Restrictions on workers (in the supply chain)</td>
<td>0</td>
<td>The individual elements of the assessment are met or not as follows: Score 1 • Not met: Free movement rules in codes or contracts • Not met: How these practices are implemented and monitored for agencies, labour brokers or recruiters Score 2 • Not met: Both requirements under score 1 met • Not met: Provide analysis of trends in progress made</td>
</tr>
<tr>
<td>D.2.6.b</td>
<td>Freedom of association and collective bargaining (in the supply chain)</td>
<td>0</td>
<td>The individual elements of the assessment are met or not as follows: Score 1 • Not met: FoA &amp; CB rules in codes or contracts • Not met: How working with suppliers on FoA and CB Score 2 • Not met: Both requirements under score 1 met • Not met: Provide analysis of trends in progress made</td>
</tr>
<tr>
<td>D.2.7.b</td>
<td>Health and safety: Fatalities, lost days, injury rates (in the supply chain)</td>
<td>0</td>
<td>The individual elements of the assessment are met or not as follows: Score 1 • Not met: 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 • Not met: How working with suppliers on H&amp;S • Not met: Provide analysis of trends in progress made</td>
</tr>
<tr>
<td>D.2.8.b</td>
<td>Women’s rights (in the supply chain)</td>
<td>0</td>
<td>The individual elements of the assessment are met or not as follows: Score 1 • Not met: Women’s rights in codes or contracts • Not met: How working with suppliers on women’s rights Score 2 • Not met: Both requirement under score 1 met • Not met: Provide analysis of trends in progress made</td>
</tr>
<tr>
<td>D.2.9.b</td>
<td>Working hours (in the supply chain)</td>
<td>0</td>
<td>The individual elements of the assessment are met or not as follows: Score 1 • Not met: Working hours in codes or contracts • Not met: How working with suppliers on working hours Score 2 • Not met: Both requirements under score 1 met • Not met: Provide analysis of trends in progress made</td>
</tr>
</tbody>
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**E. Performance: Responses to Serious Allegations (20% of Total)**

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<tbody>
<tr>
<td>E(1).0</td>
<td>Serious allegation No 1</td>
<td>0</td>
<td>No allegations meeting the CHRB severity threshold were found, and so the score of 0.00 out of 80 points scored in themes A-D &amp; F has been applied to produce a score of 0.00 out of 20 points for theme E.</td>
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**F. Transparency (10% of Total)**

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<tbody>
<tr>
<td>F.1</td>
<td>Company willingness to publish information</td>
<td>0 out of 4</td>
<td>Out of a total of 40 indicators assessed under sections A-D of the benchmark, Heilan Home made data public that met one or more elements of the methodology in 0 cases, leading to a disclosure score of 0 out of 4 points.</td>
</tr>
<tr>
<td>F.2</td>
<td>Recognised Reporting Initiatives</td>
<td>0 out of 2</td>
<td>The individual elements of the assessment are met or not as follows: Score 2 • Not met: Company reports on GRI • Not met: Company reports on SASB • Not met: Company reports on UNGPRF</td>
</tr>
<tr>
<td>Indicator Code</td>
<td>Indicator name</td>
<td>Score</td>
<td>Explanation</td>
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</tbody>
</table>
| F.3            | Key, High Quality Disclosures       | 0 out of 4 | Heilan Home met 0 of the 8 thresholds listed below and therefore gets 0 out of 4 points for the high quality disclosure indicator. Specificity and use of concrete examples  
• Not met: Score 2 for A.2.2 : Board discussions  
• Not met: Score 2 for B.1.6 : Monitoring and corrective actions  
• Not met: Score 2 for C.1 : Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers  
• Not met: Score 2 for C.3 : Users are involved in the design and performance of the channel(s)/mechanism(s)  
Discussing challenges openly  
• Not met: Score 2 for B.2.4 : Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts  
• Not met: Score 2 for C.7 : Remediying adverse impacts and incorporating lessons learned  
Demonstrating a forward focus  
• Not met: Score 2 for A.2.3 : Incentives and performance management  
• Not met: Score 2 for B.1.2 : Incentives and performance management |

**Disclaimer**

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

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

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