

Company Name PVH
Industry Apparel (Supply Chain only)
Overall Score (*) 24.7 out of 100

Theme Score	Out of	For Theme
1.4	10	A. Governance and Policies
1.1	25	B. Embedding Respect and Human Rights Due Diligence
2.1	15	C. Remedies and Grievance Mechanisms
6.1	20	D. Performance: Company Human Rights Practices
12.5	20	E. Performance: Responses to Serious Allegations
1.5	10	F. Transparency

(*) Please note that any small differences between the Overall Score and the added total of Measurement Theme scores are due to rounding the numbers at different stages of the score calculation process.

Please note also that the "Not met" labels in the Explanation boxes below do not necessarily mean that the company does not meet the requirements as they are described in the bullet point short text. Rather, it means that the analysts could not find information *in public sources* that met the requirements *as described in full* in the CHRB 2019 Methodology document. For example, a "Not met" under "General HRs Commitment", which is the first bullet point for indicator A.1.1, does not necessarily mean that the company does not have a general commitment to human rights. Rather, it means that the CHRB could not identify a public statement of policy in which the company commits to respecting human rights.

Detailed assessment

A. Governance and Policies (10% of Total)

A.1 Policy Commitments (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1.1	Commitment to respect human rights	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: UNGC principles 1 & 2: The Company discloses that 'as members of the UN Global Compact, we continued to support this critical initiative and remain dedicated to practicing sustainable and socially responsible policies, while also providing transparency on how they are being implemented'. [Corporate Responsibility Report, 2018: https://responsibility.pvh.com/wp-content/themes/twentytynineteen/static-pages/static/resources/pvh-cr18.pdf#responsibility.pvh.com] <p>Score 2</p> <ul style="list-style-type: none"> Not met: UNGPs: The Company discloses in its Corporate Responsibility Report, in the GRI section, that responses to the UN Guiding Principles. However, there is no description of a commitment from the Company to UNGPs. [Corporate Responsibility Report, 2018: responsibility.pvh.com] Not met: OECD
A.1.2	Commitment to respect the human rights of 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"> Not met: ILO Core: The Company explicitly commits to the following: non-discrimination, forced labor, child labor and freedom of association were explicitly stated as core values of the Company's Code of Conduct. However, the Company only stated that their suppliers are expected to respect their employees right to collective bargain and did not commit to do the same for its own workers, therefore it does not meet the criteria for this indicator. [A Shared Commitment, 2018: responsibility.pvh.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Met: UNGC principles 3-6: The Company openly committed to the principles 3 to 6 of the United Nations Global Compact. "PVH is committed to strictly complying with all applicable laws, conventions and regulations. Additionally, we follow global guidance provided by the following organizations: (...) United Nations Global Compact (UNGC), Principles 3, 4, 5, and 6" [Living Wage Strategy: responsibility.pvh.com] • Met: Explicitly list ALL four ILO for AP suppliers: The Company explicitly commits to the following: non-discrimination, forced labor, child labor and freedom of association and collective bargain. With respect the last two, the Company indicates: 'Our business partners are required to recognize and respect the right of their employees to freedom of association and collective bargaining. Employees should be free to join organizations of their choice.' These were explicitly stated as core values on the Company's 'Shared commitment' document. [A Shared Commitment, 2018: responsibility.pvh.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Explicit commitment to All four ILO Core: See above. No evidence found in relation to collective bargaining for the Company's own operations. [A Shared Commitment, 2018: responsibility.pvh.com] • Not met: Respect H&S of workers: The Company states that 'Each officer, director and associate has responsibility for maintaining a safe and healthy workplace for all officers, directors and associates by following safety and health rules and practices and reporting accidents, injuries and unsafe equipment, practices or conditions'. However, it is not clear if this commitment applies to all employees. [Code of Conduct, N/A: pvh.com] • Met: H&S applies to AP suppliers: The Company states that 'Our business partners must provide a safe and healthy workplace designed and maintained to prevent accidents, illness and injury attributable to the work performed or the operation of the facility and machinery. In doing so, our business partners must comply with all national laws, regulations and best practices concerning health and safety in the workplace, as well as provide all required and appropriate workers compensation coverage in the event of injury or fatality'. [CSR Supplier Guidelines: responsibility.pvh.com] • Not met: working hours for workers: The company has a working hour statement for suppliers but no evidence found of a commitment to respect own employees working hours. [Living Wage Strategy: responsibility.pvh.com] • Met: Working hours for AP suppliers: Our business partners are prohibited from requiring their employees to work more than the regular and overtime hours permitted under the law of the country where they are employed. In no circumstance may regular hours exceed 48 hours in a week and, other than in exceptional circumstances, the sum of regular and overtime hours in a week cannot exceed 60 hours. Employees must have at least 24 consecutive hours of rest in every seven-day period. Our business partners are not permitted to request overtime on a regular basis. All overtime must be consensual and compensated at a premium rate. [A Shared Commitment, 2018: responsibility.pvh.com & Corporate Responsibility Statement, 2017: responsibility.pvh.com]
A.1.3.AP	Commitment to respect human rights particularly relevant to the industry (AP)	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: Women's Rights • Not met: Children's Rights • Not met: Migrant worker's rights: The company states that "PVH is committed to ensuring that migrant workers are recruited ethically, live decently and are successfully integrated into the factory workforce and local communities. As a condition of doing business with PVH, suppliers, factories and facilities are required to comply with all applicable national and local labor laws and regulations. If the law and guidelines within this policy conflict, suppliers, factories and facilities should comply with the stricter standard. This policy applies equally to both foreign and internal/domestic migrant workers." [CSR Supplier Guidelines: responsibility.pvh.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: CEDAW/Women's Empowerment Principles: The Company explicitly stated its suppliers are expected to respect the UN Women's Empowerment Principles. "More broadly, we focus on equality and women's advancement in the workplace through our commitment to the U.N.'s Women's Empowerment Principles and our support for organizations such as the Human Rights Campaign." [A Shared Commitment, 2018: responsibility.pvh.com] • Not met: Convention on migrant workers

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Met: Respecting the right to water: The Company openly commits to respect the right to water. "Our Commitment: Safeguard and preserve water resources to ensure the continuity and quality of water supply for our business and the community". The company is also committed to the CEO Water Mandate. [CSR Supplier Guidelines: responsibility.pvh.com] • Met: Expecting suppliers to respect these rights: The Company openly commits to respect the right to water. "Our Commitment: Safeguard and preserve water resources to ensure the continuity and quality of water supply for our business and the community". Suppliers are expected to respect these rights. [CSR Supplier Guidelines: responsibility.pvh.com]
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 • Not met: Regular stakeholder engagement <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 <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	<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: CEO or Board approves policy • Not met: Board level responsibility for HRs <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 • Not met: At least one key AP HR risk, beyond employee H&S <p>Score 2</p> <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	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"> • Met: Commits to ILO core conventions: See indicator A.1.2 [A Shared Commitment, 2018: responsibility.pvh.com] • Not met: Senior responsibility for HR <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Day-to-day responsibility • Not met: Day-to-day responsibility for AP in supply chain

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 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"> • Met: Commits to ILO core conventions: See indicator A.1.2 [A Shared Commitment, 2018: responsibility.pvh.com] • Not met: Communicates its policy to all workers in own operations Score 2 <ul style="list-style-type: none"> • Not met: Commits to all 4 ILO core conventions: See indicator A.1.2 [A Shared Commitment, 2018: responsibility.pvh.com] • 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 <ul style="list-style-type: none"> • Not 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 Score 2 <ul style="list-style-type: none"> • Not met: How HR commitments made binding/contractual: The Company describes how the adherence to human rights policies impact business relations, as it states that not being able to meet its code of conduct may cause the Company to end the business relation. "we track supplier performance to chart progress against goals and expectations, and drive enhanced decision-making internally by rewarding high-performing suppliers with more production volume. Conversely, we will not work with partners that do not share our values or cannot meet our code of conduct requirements." However, it is not clear whether supplier code or requirements for suppliers are part of contractual arrangements. [Corporate Responsibility Report, 2018: https://responsibility.pvh.com/wp-content/themes/twentyineteen/static-pages/static/resources/pvh-cr18.pdf#responsibility.pvh.com] • 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 <ul style="list-style-type: none"> • Met: Scores at least 1 on A.1.2 [A Shared Commitment, 2018: responsibility.pvh.com] • Not met: Trains all workers on HR policy commitments: The Company states that 'due to a change in data systems, we are no longer able to track this information'. (employee training on human right) [Corporate Responsibility Report, 2018: responsibility.pvh.com] • Not met: Trains relevant AP managers including procurement: See above. [Corporate Responsibility Report, 2018: responsibility.pvh.com] Score 2 <ul style="list-style-type: none"> • Not met: Score of 2 on A.1.2 • Not met: Both requirements under score 1 met
B.1.6	Monitoring and corrective actions	0.5	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 [A Shared Commitment, 2018: responsibility.pvh.com] • Not met: Monitoring implementation of HR policy commitments: The Company does not describe how it monitors the implementation of human rights policies. "In 2017, we launched our PVH Responsible Business Practices program to help our associates better understand the human rights implications of their daily decisions. We are raising awareness about how good purchasing practices, including accurate planning and technical specifications, as well as calendar adherence, can enable suppliers to improve working conditions by increasing predictability and visibility." [Corporate Responsibility Report, 2018: https://responsibility.pvh.com/wp-content/themes/twentyineteen/static-pages/static/resources/pvh-cr18.pdf#responsibility.pvh.com] • Not met: Monitoring AP suppliers

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> • Met: Score of 2 on A.1.2 • Not met: Describes corrective action process • Not met: Example of corrective action • Met: Discloses % of AP supply chain monitored: The Company discloses data about supply chain human rights compliance. "Overall, we demonstrated strong results with supplier performance in 2017, with 90 percent of our direct and licensee factories either meeting or exceeding our supplier performance expectations." [Corporate Responsibility Report, 2018: https://responsibility.pvh.com/wp-content/themes/twentytynineteen/static-pages/static/resources/pvh-cr18.pdf#responsibility.pvh.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"> • Not met: HR affects AP selection of suppliers • Met: HR affects on-going AP supplier relationships: PVH uses a color coded rating system to indicate the compliance status of its business partners to PVH's policies, which varies from green (best) to red (worst). If a 'Factory uses forms of forced labor – including prison labor, trafficking, slavery, and indentured workers – in which workers' freedom of movement, ability to willingly leave work, and human rights are denied or severely restricted', it is rated as red. PVH's Zero Tolerance Issues defines that, if a supplier has one or more Zero Tolerance Issues or has not responded to warnings and/or demonstrated a lack of commitment and transparency and the Factory will not be considered for future business for one year (this period can be reduced if the supplier can present compelling evidence of effective remediation). [Corporate Responsibility Report, 2018: https://responsibility.pvh.com/wp-content/themes/twentytynineteen/static-pages/static/resources/pvh-cr18.pdf#responsibility.pvh.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirement under score 1 met • Not met: Working with AP suppliers to improve performance: According to the Company, it provides a corrective action plan (CAP) for suppliers that failed to present perfect compliance rating. "PVH CSR will send out an Authorization Letter to the in-scope factory or Supply Chain Partner and attach the corrective action plan (CAP) form as well as the Supplier Guidelines, copying the respective PVH Business Division head(s). The CAP form should describe how each finding will be remediated, including a timeframe." This, however does not characterize as working with suppliers to improve performance. [CSR Supplier Guidelines: responsibility.pvh.com]
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 • Not met: Frequency and triggers for engagement • Not met: Workers in AP SC engaged • Not met: Communities in the AP SC engaged <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)	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: Salient risk assessment (and context) • 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

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.3	Integrating and Acting: Integrating assessment findings internally and taking appropriate action	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Action Plans to mitigate risks • Not met: Including in AP supply chain • Not met: Example of Actions decided Score 2 <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	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: System to check if Actions are effective • Not met: Lessons learnt from checking effectiveness Score 2 <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	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • 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 <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	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: The Company discloses in its Corporate Responsibility Report that 'Associates and workers can report any suspected policy violations, inappropriate behavior, and unethical practices via Tell PVH, our global reporting hotline. Since 2017, our global reporting hotline, Tell PVH, is open to all workers in our supply chain, in addition to PVH associates'. [Corporate Responsibility Report, 2018: https://responsibility.pvh.com/wp-content/themes/twenty十九/static-pages/static/resources/pvh-cr18.pdf#responsibility.pvh.com] Score 2 <ul style="list-style-type: none"> • Not met: Number grievances filed, addressed or resolved • Not met: Channel is available in all appropriate languages: The Company discloses that 'workers and associates, subject to certain legal limitations, can report any suspected policy violations, inappropriate behavior and unethical practices via the hotline. In the majority of cases, they can make reports anonymously, either online or by telephone, in one of 15 languages'. However, it is not clear if these 15 languages cover all the countries in which the Company operates. [Corporate Responsibility Report, 2018: https://responsibility.pvh.com/wp-content/themes/twenty十九/static-pages/static/resources/pvh-cr18.pdf#responsibility.pvh.com] • Met: Expect AP supplier to have equivalent grievance systems: The Company discloses in its CSR Suppliers Guidelines that an example of best practices from suppliers is to 'implement a worker hotline that can handle sensitive grievances such as harassment and abuse. The hotline should allow workers the ability to file a grievance anonymously if so desired'. [CSR Supplier Guidelines: responsibility.pvh.com] • Met: Opens own system to AP supplier workers: The Company states that 'since 2017, our global reporting hotline, Tell PVH, is open to all workers in our supply chain, in addition to PVH associates. It acts as a channel for PVH to capture and address concerns or complaints raised by the people who work for us directly and indirectly in our supply chain'. [Corporate Responsibility Report, 2018: https://responsibility.pvh.com/wp-content/themes/twenty十九/static-pages/static/resources/pvh-cr18.pdf#responsibility.pvh.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
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 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 Not met: Description of how they do this Score 2 <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	0.5	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 disclose timescales to its grievance process, as there is only a sample grievance process as a measurement of time. [CSR Supplier Guidelines: responsibility.pvh.com] Not met: How complainants will be informed Score 2 <ul style="list-style-type: none"> Met: Escalation to senior/independent level: The Company discloses that 'When we receive a worker grievance, either from the worker directly or via a union or NGO, CR associates document the issue and escalate it immediately to our CR leadership via a weekly reporting and escalation process that is documented through a standard operating procedure, from factory notification through executive review. The corporate and regional CR teams coordinate to address the issue by engaging the worker, factory managers, the relevant PVH sourcing team, and potentially third parties. In addition the Company discloses how grievances may be escalated: "STAGE 1 Worker Grievance": "Method: Written or Verbal. Reported To: Immediate Supervisor. Procedure: Supervisor decision, with written response to worker. Conditions: If grievance contested, worker asked to attend meeting to discuss issue. Worker may have representative present. Response Time: 5 days"; "STAGE 2 Escalation": "Method: Written or Verbal. Nature of Grievance: Unresolved Stage 1, or Subject is worker's Immediate supervisor. Reported To: HR Manager or other "neutral" party. Procedure: Hear both worker and supervisor side; written response to worker. Conditions: Worker may have representative present at hearing. Response Time: 7 days."; "STAGE 3 Appeal Process": "Method: Written. Nature of Grievance: Appeal unfavorable resolution or Compliant about handling. Nature of grievance. Reported To: Grievance Committee. Procedure: Formal hearing for worker to present grievance and hear from other parties. Conditions: Worker may have representative present at hearing. Response Time: 7 days." [CSR Supplier Guidelines: responsibility.pvh.com & Corporate Responsibility Report, 2018: responsibility.pvh.com]
C.5	Commitment to non-retaliation over complaints or concerns made	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Met: Public statement prohibiting retaliation: The Company has a non-retaliation policy in place. 'The Company prohibits all forms of retaliation against any person who reports possible misconduct in good faith, as well as against any person who cooperates in an investigation'. [A Shared Commitment, 2018: responsibility.pvh.com] Not met: Practical measures to prevent retaliation: According to the Company, it will investigate and take action if any unethical behavior is identified. "The Company will promptly investigate allegations of unethical conduct and take action as appropriate." But does not indicate any practical measures to prevent retaliation. [A Shared Commitment, 2018: responsibility.pvh.com] Score 2 <ul style="list-style-type: none"> Not met: Has not retaliated in practice Met: Expects AP suppliers to prohibit retaliation: The Company states that 'Retaliation of any kind against employees who provided information during an assessment is strictly prohibited. After an assessment, supplier workers can also communicate with PVH using 'Tell PVH', a hotline service offered by the PVH CR department. Tell PVH is not a substitute for any existing supplier grievance mechanisms. PVH has zero-tolerance for any retaliation against workers, including

Indicator Code	Indicator name	Score (out of 2)	Explanation
			punishment by termination, for disclosing certain information to PVH or PVH representatives. The supplier should not interfere with, discourage or punish workers for communicating with PVH or PVH representatives'. [CSR Supplier Guidelines: responsibility.pvh.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	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Describes how remedy has been provided Score 2 <ul style="list-style-type: none"> • Not met: Changes introduced to stop repetition • 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	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Living wage in supplier code or contracts: The Company does not commit to paying wages that meets the employee's family basic needs and discretionary income. "PVH believes that every worker has a right to compensation that is sufficient to meet basic needs and provide some discretionary income." [Living Wage Strategy: responsibility.pvh.com] Score 2 <ul style="list-style-type: none"> • Not met: Improving living wage practices of suppliers • 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	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Avoids business model pressure on HRs • Met: Positive incentives to respect human rights: The Company has a purchase strategy linked to human rights performance. "we track supplier performance to chart progress against goals and expectations, and drive enhanced decision-making internally by rewarding high-performing suppliers with more production volume. Conversely, we will not work with partners that do not share our values or cannot meet our code of conduct requirements." [Corporate Responsibility Report, 2018: https://responsibility.pvh.com/wp-content/themes/twentytynineteen/static-pages/static/resources/pvh-cr18.pdf#responsibility.pvh.com] Score 2 <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met
D.2.3	Mapping and disclosing 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: Identifies suppliers back to product source: The Company only discloses factories by country and does not describe how it maps suppliers. [Factory list disclosure, June 30 2019: responsibility.pvh.com] Score 2 <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)	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Child Labour rules in codes or contracts: The Company prohibits child labor in its supply chain. "Employees of our business partners must be at least 15 years old or over the age required for completion of compulsory education in the country of manufacture, whichever is higher. Our business partners are also required to observe all legal requirements for the work of authorized minors, including those pertaining to hours of work, wages, work type and working conditions." The Company states it expects suppliers do the following: "Implementing internal policies that prohibit the recruitment of under-age workers; Implementing a system of age verification; Ensuring young workers do not work in hazardous conditions; Providing financial and other support to young workers who may be found in, or forced into, the workforce." [CSR Supplier Guidelines: responsibility.pvh.com] <ul style="list-style-type: none"> • Not met: How working with suppliers on child labour

Indicator Code	Indicator name	Score (out of 2)	Explanation
			Score 2 <ul style="list-style-type: none"> • 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	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Debt and fees rules in codes or contracts: The Company indicates in its Supplier Guidelines that business partners cannot deduct from workers' wages, costs or fees associated with employment eligibility such as health check, employment registration, work permits or recruitment agency fees. [CSR Supplier Guidelines: responsibility.pvh.com] • Not met: How working with suppliers on debt & fees 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.2.5.d	Prohibition on forced labour: Restrictions on workers (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: Free movement rules in codes or contracts: The Company states its suppliers cannot restrict free movement of workers. "DO NOT require workers to live in factory owned or controlled residences. (...) DO NOT impose unreasonable curfews in dormitories that restrict the movement of workers during their leisure time." [CSR Supplier Guidelines: responsibility.pvh.com] • Not met: How these practices are implemented and monitored for agencies, labour brokers or recruiters 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.2.6.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: The Company expects its suppliers respect their employees right to affiliation. "Our business partners are required to recognize and respect the right of their employees to freedom of association (FOA) and collective bargaining. Employees should be free to join organizations of their choice. Employees should not be subjected to intimidation or harassment in the exercise of their right to join or to refrain from joining any organization." [CSR Supplier Guidelines: responsibility.pvh.com] • 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)	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Sets out clear Health and Safety requirements: The Company sets out clear health and safety requirements for its suppliers. "In general, businesses must provide; A clean, hygienic, well lit workplace free from uncontrolled hazards that could result in severe injury or illness; Information and knowledge to workers on the hazards that they may face and how to avoid injury or illness; Procedures for identifying workplace hazards and assessing their risks; Proper equipment for the control of hazards such as guards, locks, ventilation, alarms, personnel protective equipment, etc. That is properly maintained and available to all that require it; Surveillance of the health conditions of the workforce." [CSR Supplier Guidelines: responsibility.pvh.com] • 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: The Company expects its suppliers to respect working hours. "Our business partners are prohibited from requiring their employees to work more than the regular and overtime hours permitted under the law of the country where they are employed. In no circumstance may regular hours exceed 48 hours in a week and, other than in exceptional circumstances, the sum of regular and overtime hours in a week cannot exceed 60 hours. Employees must have at least 24 consecutive hours of rest in every seven-day period." [CSR Supplier Guidelines: responsibility.pvh.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: 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 Company 1 as supplying a number of major fashion brands, including Calvin Klein & Tommy Hilfiger (PVH). Connected to this Company 1 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. 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	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 response available: The company provides a response on the BHRRC website. [PVH response to ICN allegations (BHRRC), 27/02/2018: https://business-humanrights.org/Response_Business and Human Rights Resource Center_ICN_20180227.pdf] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Response goes into detail: The company provides a lengthy response however it fails to address the specific allegations raised, "PVH's assessment tool and current supplier guidelines address all categories of violations alleged in the report which are monitored in our regular assessment program. Furthermore, we continue to build upon our assessment program and are focused on moving beyond compliance, partnering with our suppliers to better understand the root causes of recurring issues and build their capacity to better manage noncompliance issues". The company does note that "Also, PVH will engage with the other apparel companies named to be sourcing from Company 1 to ensure coordinated efforts to address the findings raised". However this is insufficient detail to receive a score. [PVH response to ICN allegations (BHRRC), 27/02/2018: https://business-humanrights.org/Response_Business and Human Rights Resource Center_ICN_20180227.pdf]

Indicator Code	Indicator name	Score (out of 2)	Explanation
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's supplier policy 'A Shared Commitment' says "Our business partners are prohibited from utilizing forced labor, whether in the form of prison labor, indentured labor, bonded labor or otherwise. Mental and physical coercion, slavery and human trafficking are prohibited throughout our supply chain". It also states that "Our Code is informed by the United Nation's Universal Declaration of Human Rights and is based on the Core Conventions of the International Labour Organization (ILO)". [Corporate Responsibility Report, 2018: responsibility.pvh.com & A Shared Commitment, 2018: responsibility.pvh.com] • Met: Policies apply to the type of business relationships involved: The company has 'A Shared Commitment' code, outlining the expectations for suppliers and other business partners, which states "This code is of utmost importance to PVH Corp. and embodies our commitment to the workers who manufacture our products and their communities. Adherence to the human and labor rights standards in this code by those who seek to do business with us, and by their business partners in our supply chain, is a prerequisite for establishing or continuing a relationship with our company." [A Shared Commitment, 2018: responsibility.pvh.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Policies address the specific rights in question: The company's 'A Shared Commitment' code prohibits a range of behaviour such as forced labour and harassment & abuse, however it doesn't refer to the workers rights regarding freedom of movement. [A Shared Commitment, 2018: responsibility.pvh.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 "We are in contact with ICN and Civedep to determine any appropriate next steps. Additionally, in order to ensure that these matters are addressed in a collective manner, we are in touch with the other apparel companies named as sourcing from this vendor." However, there is no evidence that the company engaged with the women themselves or with similar type -(women in the same working and living conditions in the same region) [PVH response to ICN allegations (BHRRC), 27/02/2018: https://business-humanrights.org Response_Business and Human Rights Resource Center_ICN_20180227.pdf] • Met: Encourages linked business to engage affected stakeholders: The company said "PVH will reiterate its expectations to vendors through our capacity building efforts in the region specifically around forced labor, harassment, wages and freedom of movement in upcoming engagements. Also, PVH will engage with the other apparel companies named to be sourcing from Company 1 to ensure coordinated efforts to address the findings raised. [PVH response to ICN allegations (BHRRC), 27/02/2018: https://business-humanrights.org Response_Business and Human Rights Resource Center_ICN_20180227.pdf] • Met: Provides remedies to affected stakeholders: The company said "While PVH respects ICN and Civedep's position not to disclose factory names, it can be challenging to effectively remediate the issues raised without such information." Therefore CHRB awards this points because the company cannot provide remedy to those women whose identity is unknown [PVH response to ICN allegations (BHRRC), 27/02/2018: https://business-humanrights.org Response_Business and Human Rights Resource Center_ICN_20180227.pdf] • Not met: Has reviewed management systems to prevent recurrence: The company says "PVH's assessment tool and current supplier guidelines address all categories of violations alleged in the report which are monitored in our regular assessment program. Furthermore, we continue to build upon our assessment program and are focused on moving beyond compliance, partnering with our suppliers to better understand the root causes of recurring issues and build their capacity to better manage noncompliance issues." However this doesn't identify any specific actions that have been undertaken in the wake of the allegations raised. [PVH response to ICN allegations (BHRRC), 27/02/2018: https://business-humanrights.org Response_Business and Human Rights Resource Center_ICN_20180227.pdf] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Remedies are satisfactory to the victims: The company said "While PVH respects ICN and Civedep's position not to disclose factory names, it can be challenging to effectively remediate the issues raised without such information." Therefore CHRB awards this points because the company cannot provide remedy to those women whose identity is unknown [PVH response to ICN allegations

Indicator Code	Indicator name	Score (out of 2)	Explanation
			(BHRRC), 27/02/2018: https://business-humanrights.org Response_Business and Human Rights Resource Center_ICN_20180227.pdf] <ul style="list-style-type: none"> • Not met: Has improved systems and engaged affected stakeholders: The company says "We continue to build upon our assessment program and are focused on moving beyond compliance, partnering with our suppliers to better understand the root causes of recurring issues and build their capacity to better manage noncompliance issues. PVH will continue its efforts to deliver training on working conditions, management systems and employment practices, share practical strategies, and support our vendors in the region to better manage human rights risk in their factories". However this doesn't provide any specific details about what improvements have been undertaken in PVH's systems, nor does the company elaborate on the types of engagement it has had with ICN or the other companies named in the report as sourcing from Company 1. [PVH response to ICN allegations (BHRRC), 27/02/2018: https://business-humanrights.org Response_Business and Human Rights Resource Center_ICN_20180227.pdf]

F. Transparency (10% of Total)

Indicator Code	Indicator name	Score	Explanation
F.1	Company willingness to publish information	1.5 out of 4	Out of a total of 40 indicators assessed under sections A-D of the benchmark, PVH made data public that met one or more elements of the methodology in 15 cases, leading to a disclosure score of 1.5 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	PVH 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.