

Company Name VF
Industry Apparel (Supply Chain and Own Operations)
Overall Score (*) 58.5 out of 100

Theme Score	Out of	For Theme
4.1	10	A. Governance and Policies
18.5	25	B. Embedding Respect and Human Rights Due Diligence
10.4	15	C. Remedies and Grievance Mechanisms
14.2	20	D. Performance: Company Human Rights Practices
5.0	20	E. Performance: Responses to Serious Allegations
6.4	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	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: General HRs commitment: In its website section 'Worker Well-being' the Company states: 'The International Labour Organization (ILO) defines universal human rights as those inherent to all human beings regardless of race, sex, nationality, ethnicity, language, religion, or any other status. These human rights include the right to life and liberty, freedom from slavery and torture, freedom of opinion and expression, and the right to work and education, among others. We believe that every worker in our global supply chain is entitled to these rights without exception.' However this commitment refers only to Supply Chain and the source is not an official policy or document. [Worker wellbeing, 03/2019: sustainability.vfc.com] • Not met: UNGC principles 1 & 2 • Not met: UDHR • Not met: International Bill of Rights <p>Score 2</p> <ul style="list-style-type: none"> • Not met: UNGPs • Not met: OECD
A.1.2	Commitment to respect the human rights of workers	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: ILO Core: In its S&R Report the Company indicates: 'VF clearly communicates our expectations for respecting human rights through our Code of Conduct for our own operations and through our Global Compliance Principles with suppliers'. The Code of Business Conduct does not cover all ILO core (only no-

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>discrimination), however the Code adds: 'At VF, we have adopted Global Compliance Principles to govern all facilities that produce goods for our Company. These principles reflect our commitment to individual rights throughout our operations, including the right to work freely, bargain collectively and be compensated fairly. VF follows applicable labor laws in place wherever we operate, and does not permit the use of forced or involuntary labor in any of our operations or the operations of facilities that produce goods for VF. We do not permit discrimination against or harassment of our colleagues who choose to be represented by a trade union. For additional information, see our Global Compliance Principles.' Its Global Compliance Principles cover own operations and suppliers and includes provisions for all ILO core. [Code of Business Conduct, 20/06/2019: d1io3yog0oux5.cloudfront.net & Global Compliance Principles (website), 04/2019: sustainability.vfc.com]</p> <ul style="list-style-type: none"> • Met: Explicitly list ALL four ILO for AP suppliers: The Company's Global Compliance Principles apply to 'all facilities that produce goods for VF Corporation or any of its subsidiaries, divisions, or affiliates, including facilities owned and operated by VF and its contractors, agents and suppliers, referred to in this document as VF Authorized Facilities.' The principles cover all ILO core areas: 'No person shall be employed at an age younger than 15 or under the age for completing compulsory education in the country of manufacture, whichever is higher.[...] not use involuntary or forced labor, including indentured labor, bonded labor or any other form of forced labor, including human trafficking. [...] recognize and respect the right of employees to freedom of association and collective bargaining. [...] not discriminate on the basis of race, [...] or any other legally protected factor.' Furthermore, the Principles cover also subcontracting: 'VF Authorized Facilities will not use subcontractors in the manufacturing of VF products or components without VF's written approval and only after the subcontractor has agreed to comply with these Global Compliance Principles.' [Global Compliance Principles (website), 04/2019: sustainability.vfc.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Explicit commitment to All four ILO Core: As indicated above, the Global Compliance Principles cover own operations and suppliers and include provisions for all ILO Core. With respect freedom of association and collective bargaining, the Company indicates: 'Authorized Facilities shall recognize and respect the right of employees to freedom of association and collective bargaining. No employee shall be subject to harassment, intimidation or retaliation in their efforts to freely associate or bargain collectively.' [Code of Business Conduct, 20/06/2019: d1io3yog0oux5.cloudfront.net & Global Compliance Principles (website), 04/2019: sustainability.vfc.com] • Met: Respect H&S of workers: See above. In addition its Global Compliance Principles, regarding Health and Safety, states that 'VF authorized Facilities must provide their employees with a clean, safe and healthy work environment, designed to prevent accidents and injury to health arising out of or occurring during the course of work. VF Authorized Facilities are required to comply with all applicable, legally mandated standards for workplace health and safety in the countries and communities in which they operate.' [Code of Business Conduct, 20/06/2019: d1io3yog0oux5.cloudfront.net & Global Compliance Principles (website), 04/2019: sustainability.vfc.com] • Met: H&S applies to AP suppliers: Its Global Compliance Principles, which cover own operations and suppliers, indicates: 'VF authorized Facilities must provide their employees with a clean, safe and healthy work environment, designed to prevent accidents and injury to health arising out of or occurring during the course of work. VF Authorized Facilities are required to comply with all applicable, legally mandated standards for workplace health and safety in the countries and communities in which they operate.' [Global Compliance Principles (website), 04/2019: sustainability.vfc.com] • Met: working hours for workers: See above. Finally in its Global Compliance Principles the Company also has a principle covering hours of work that indicates 'Employees must not be required, except in extraordinary circumstances, to work more than sixty hours per week including overtime or the local legal requirement, whichever is less. A regular work week shall not exceed 48 hours. All overtime must be consensual and not requested on a regular basis. All employees will be entitled to at least 24 hours of consecutive rest in every seven-day period.' [Code of Business Conduct, 20/06/2019: d1io3yog0oux5.cloudfront.net & Global Compliance Principles (website), 04/2019: sustainability.vfc.com] • Met: Working hours for AP suppliers: Its Global Compliance Principles, which covers own operations and suppliers, indicates: 'Employees must not be required, except in extraordinary circumstances, to work more than sixty hours per week

Indicator Code	Indicator name	Score (out of 2)	Explanation
			including overtime or the local legal requirement, whichever is less. A regular work week shall not exceed 48 hours. All overtime must be consensual and not requested on a regular basis. All employees will be entitled to at least 24 hours of consecutive rest in every seven-day period.' [Global Compliance Principles (website), 04/2019: sustainability.vfc.com]
A.1.3.AP	Commitment to respect human rights particularly relevant to the industry (AP)	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: Women's Rights: Its Global Compliance Principles, which cover own operations and suppliers, states: 'Principle 10 – Women’s Rights VF Authorized Facilities must ensure that women workers receive equal remuneration, including benefits, equal treatment, equal evaluation of the quality of their work and equal opportunity to fill all positions open to male workers. Pregnancy tests will not be a condition of employment, nor will they be demanded of employees. Workers who take maternity leave (of a duration determined by local and national laws) will not face dismissal nor threat of dismissal, loss of seniority or deduction of wages, and will be able to return to their former or comparable employment at the same rate of pay and benefits. Workers will not be forced or pressured to use contraception. Workers will not be exposed to hazards, including glues and solvents, which may endanger their safety, including their reproductive health. Facilities shall provide appropriate services and accommodation to women workers in connection with pregnancy. [Global Compliance Principles (website), 04/2019: sustainability.vfc.com] • Not met: Children's Rights • Not met: Migrant worker's rights • Met: Expecting suppliers to respect these rights: As indicated above, the Global Compliance Principles cover own operations and suppliers, and it include a Principle related to women's rights. [Global Compliance Principles (website), 04/2019: sustainability.vfc.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: CEDAW/Women's Empowerment Principles • Not met: Child Rights Convention/Business principles • Not met: Convention on migrant workers • Met: Respecting the right to water: In its website section 'Water' the Company indicates: 'we have a duty to ensure that we not only use water responsibly across our supply chain, but also return clean water back into the communities that depend on it. [...] We hold our manufacturing partners to stringent Global Wastewater Discharge Standards, developed in line with Business for Social Responsibility's (BSR) Wastewater Discharge Standards, to make sure the water used in production is properly treated before returning it to the surrounding ecosystem and community. [...] For many of the communities where our supplier factories operate, access to clean water and sanitation is challenged outside the factory walls. Our Worker Community Program focuses on water and hygiene issues faced by many of our supplier communities.' In addition in its Global Compliance Principle it states: 'Facilities should have policies and procedures in place to ensure environmental impacts are minimized with respect to energy, air emissions, water, [...] and other significant environmental risks. [...] Wastewater audits were recently added to the compliance list.' Finally in its Facility Guideline the Company indicates: 'Fresh potable water must be available for associates without restriction or cost. Where multiple sources of water exist, potable water must be clearly identified.' [Water: sustainability.vfc.com & Facility Guidelines: s3.amazonaws.com] • Not met: Expecting suppliers to respect these rights: Although commitment covers right to water. [Global Compliance Principles: sustainability.vfc.com & Facility Guidelines: s3.amazonaws.com]
A.1.4	Commitment to engage with stakeholders	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: Regular stakeholder engagement: The Company states that it 'values its stakeholder partnerships and works together with its partners to continuously improve human rights in its supply chain. VF has partnered with a variety of stakeholders to design and implement projects to conduct due diligence and create change. For example, VF partners with the International Organization for Migration and the Mekong Club to better identify and mitigate forced labor in the supply chain. VF also partners with a number of implementing agencies to design and implement programs to improve worker well-being in its communities, including to improve access to water, transportation safety, children's rights, and women's economic empowerment. Additionally this year, VF is creating a formalized stakeholder engagement strategy, in partnership with Business for Social

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			<p>Responsibility, which will guide our long term stakeholder partnership choices.' [2019 CHRB Supplemental Response, 21/06/2019: business-humanrights.org]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Commits to engage stakeholders in design • Not met: Regular stakeholder design engagement: In its Sustainability and Responsibility Report 2016, the Company indicates: 'The scope of our sustainability strategy and its impact is far reaching. It extends beyond the operations where we have direct ownership and control, and requires dedicated engagement of our supply chain professionals, business partners and expert stakeholders. Over the years, we have used a strategic engagement approach to identify and manage the issues most material to our business and where we have the greatest economic, social and environmental impact. This enables us to identify the greatest risks and opportunities in relation to sustainability and responsibility. In 2017, we reviewed our 2014 materiality assessment to begin reassessment of our priority issues. We amended this list as a result of new developments in the apparel and footwear sector, a review of peer materiality assessments, ongoing dialogue with stakeholders, NGO questionnaires, and lifecycle assessment results. We then prioritized the list through engagement with key external stakeholder groups including: environmental and human-rights focused NGOs, ESG investment rating agencies, trade organizations and academics, as well as internal groups, including representatives from VF's major brands and regions, and our Supply Chain, Responsible Sourcing, Public Affairs and Marketing teams. We then calculated the significance of these issues through responses from each stakeholder group, where the importance of a given issue on the business and its social, environmental and economic impact was ranked and assigned a weighting. Interviews were then conducted to better understand stakeholder perspectives, determine the relative priority of each issue, and assist in the identification of solutions.' Although the Company indicates that it engages with several stakeholder groups there are some crucial stakeholders missing: trade unions, local communities. [Sustainability and Responsibility Report 2016, 2016: s3.amazonaws.com]
A.1.5	Commitment to remedy	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 remedy: In its Global Compliance Principles the Company states: 'Violations of these Global Compliance Principles will be appropriately remedied at the cost of the facility. VF reserves the right to take necessary measures to ensure future compliance with these Global Compliance Principles.' No evidence found, however, of a formal statement of commitment to remedy any adverse impacts that it has caused or contributed to. [Global Compliance Principles (website), 04/2019: sustainability.vfc.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 • Met: Work with AP suppliers to remedy impacts: In its S&R Report the Company indicates: 'If suppliers accept the offer, we work with them to further assess working conditions and remediate problems. In circumstances where supplier improvement efforts are sub-standard or non-existent, we end our partnership.' [Sustainability and Responsibility Report 2016, 2016: s3.amazonaws.com]
A.1.6	Commitment to respect the rights of human rights defenders	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Zero tolerance attacks on HRs Defenders (HRDs): Although the Company indicates in its S&R Report that: 'Under the Open Door and Non-Retaliation policy, no associate will be penalized for voicing a question or concern,' this does not count as a statement regarding zero tolerance of threats, intimidation and attacks against human rights defenders. [Sustainability and Responsibility Report 2016, 2016: s3.amazonaws.com] <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: On its website section 'Governance', the Company indicates: 'VF's Chairman and CEO, along with the full Senior Leadership Team (SLT), is responsible for approving the strategies and goals related to social and environmental issues.' In addition, its Code of Business Conduct is signed by the CEO, and it contains commitments in relation to non-discrimination, and to all other ILO core through the responsible sourcing program section of the code (where it mentions own operations and facilities that produce goods for VF). [Governance: sustainability.vfc.com] • Not met: Board level responsibility for HRs: See above. In its S&R Report 2016, it indicates: 'The Vice President of Global Corporate Sustainability reports activities and progress to the Nominating and Governance Committee on VF's Board of Directors annually, and is scheduled to report to the full Board of Directors annually. [...] Concerns and issues of materiality are brought to the Chairman of the Board and the SLT as needed.' However, the Vice President of Global Corporate Sustainability is not a board member. [Sustainability and Responsibility Report 2016, 2016: s3.amazonaws.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Speeches/letters by Board members or CEO: Although the CEO has disclosed some articles referred to human rights issues, this articles were published in its personal LinkedIn account, and not in Company's name. [Improving Lives of Apparel and Footwear Workers...Together: linkedin.com]
A.2.2	Board discussions	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: Board/Committee review of salient HRs: In its S&R Report 2016, the Company indicates: 'VF's Board of Directors is our highest governance body. The Chairman of the Board along with the CEO and members of VF's Senior Leadership Team (SLT) are responsible for approving goals and strategies related to social and environmental issues. This team meets at least quarterly with VF's Vice President of Global Corporate Sustainability to discuss S&R issues and important topics on strategy, materiality, policies, goals, etc. [...] Concerns and issues of materiality are brought to the Chairman of the Board and the SLT as needed.' [Sustainability and Responsibility Report 2016, 2016: s3.amazonaws.com] • Met: Examples or trends re HR discussion: The Company indicates in a disclosure to CHRB Platform: 'Our VP of Global Corporate Sustainability presents annually to the Board of Directors. During the most recent presentation, human rights was a topic of conversation. Our VP shared with the BOD that we have assembled a Human Rights Working Group and identified our five salient human rights issues. The future roadmap forward for human rights was discussed as well as details on additional work currently being conducted in partnership with an outside consulting firm and SHIFT, a leading human rights NGO.' [CHRB Submission 2018, 22/08/2018: business-humanrights.org] <p>Score 2</p> <ul style="list-style-type: none"> • 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	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Commits to ILO core conventions: See indicator A.1.2

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			<ul style="list-style-type: none"> • Met: Senior responsibility for HR: On its website, section 'Governance', the Company indicates: 'VF's Chairman and CEO, along with the full Senior Leadership Team (SLT), is responsible for approving the strategies and goals related to social and environmental issues. This global team receives progress updates at least once per quarter by VF's Vice President of Global Corporate Sustainability. The Vice President of Global Corporate Sustainability reports to the Nominating and Governance Committee on VF's Board of Directors, to the full Board of Directors once each year. We monitor progress against S&R targets and goals both at the corporate and individual brand level. All brand presidents report annually to VF's SLT on their sustainability goals and progress.' In addition it states: ' The Sustainability & Responsibility Leadership Team (SRLT) supports the integration of our responsible business practices and programs across our business. The SRLT is tasked with approving the scope, strategic plans, goals and policies for VF's program as well as approving strategies for addressing environmental and social issues that present risks and opportunities for VF.' [Governance: sustainability.vfc.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Day-to-day responsibility: Finally, it describe its Sustainability & Responsibility Community Practice: 'The VF Sustainability & Responsibility Community of Practice (CoP) is the catalyst for scaling sustainable innovation and practices throughout the company. The CoP comprises dedicated practitioners embedded within our business units and brands who activate our strategy, partner with internal and external stakeholders and drive performance.' The CoP includes: The Corporate Team, Brand Sustainability Teams, Responsible Sourcing Team, Responsible Sourcing Advisory Council, Social Compliance and Auditing Team [Governance: sustainability.vfc.com] • Met: Day-to-day responsibility for AP in supply chain: See above. The CoP includes, among other teams, the Responsible Sourcing Team which 'manages the social and environmental performance of VF's contract supplier network throughout our supply chain', and the Social Compliance and Auditing Team, which 'coordinates the regular auditing of all Tier 1 and strategic Tier 2 factories used by VF.' [Governance: sustainability.vfc.com]
B.1.2	Incentives and performance management	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: Senior manager incentives for human rights: The Company indicates in the CHRB submission that 'senior managers undergo annual performance evaluations against performance objectives.' It also indicates that 'all supply chain leaders have annual performance objectives linked to supply chain compliance performance'. In addition in the Know the Chain survey, the Company indicates: 'Responsibility for human rights is inherent in the objectives of senior supply chain leaders at VF, including Tom Glaser, Vice President, VF Corporation & President, Supply Chain. His responsibilities include the oversight of all of VF's global manufacturing, sourcing and operations and he has regular meetings with the VP of HR, General Counsel, VP of Product Sourcing and VP of Public Affairs to discuss human rights issues' [CHRB submission 2016, 2016 & Know the Chain: s3.amazonaws.com] • Met: At least one key AP HR risk, beyond employee H&S: See above. In addition, the Company indicates in a disclosure to CHRB Platform: 'we have several people involved in protecting human rights at the Senior Manager level or above. VF has two Directors of Responsible Sourcing and their sustainable operations team work to build capacity around health and safety within the factory walls. Through our critical life safety programs which build a fire safety culture that the factories can implement in those types of emergencies. The team also focuses heavily on adequate standard of living issues like environment and waste water concerns which effects the factories and the local communities. Our Worker and Community Development program sits under one of our Directors of Responsible Sourcing. Our worker and community development program which seeks to improve the lives of the workers outside of the factory walls through programs around 1) Access to Clean Water and Sanitation 2) Health and Nutrition and 3) Childcare and Education. Similarly there is a Senior Manager of Government Relations and External Engagement who focuses on stakeholder and rights holder engagements and facilitates the work around VF's future approach to human rights. All three roll up to the VP of Responsible Sourcing who has (along with the team) an inclusion of human rights in their performance plan and include such things as: leading human rights review of how VF's supply chain activities may impact human rights, and delivering a focused approach that elevates (beyond VF's typical compliance approach) VF's comprehensive support of human / worker rights across the supply chain.' [CHRB Submission 2018, 22/08/2018: business-humanrights.org & Know the Chain: s3.amazonaws.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			Score 2 • Not met: Performance criteria made public
B.1.3	Integration with enterprise risk management	1	The individual elements of the assessment are met or not as follows: Score 1 • Met: HR risks is integrated as part of enterprise risk system: The Company indicates in the CHRB submission that 'human rights risks are part of VF's internal audit system. VF's vendor scorecard, factory compliance protocols, and Responsible Sourcing program provide an integrated approach to ensure human rights risks are identified, evaluated, and remedied alongside other business risks in enterprise risks management systems'. [CHRB submission 2016, 2016] Score 2 • Not met: Audit Ctte or independent risk assessment: It does not indicate, however, whether the Board Audit Committee or an independent assessment was carried out of the adequacy of the risk management systems in managing human rights. [Audit Committee Charter, 2017: d1io3yog0oux5.cloudfront.net]
B.1.4.a	Communication /dissemination of policy commitment(s) within Company's own operations	1	The individual elements of the assessment are met or not as follows: Score 1 • Met: Commits to ILO core conventions: See indicator A.1.2 • Met: Communicates its policy to all workers in own operations: In its public response to CHRB assessment the company states that 'for our owned manufacturing, we communicate our policies in multiple languages including English, Spanish, Turkish and Chinese, which cover all languages spoken by our employee base'. [CHRB submission 2016, 2016] Score 2 • Met: Commits to all 4 ILO core conventions: See indicator A.1.2 • Not met: Communication of policy commitments to stakeholder: The Company indicates in the CHRB submission that 'VF communicates its human rights policy commitments to employees and other stakeholders (including workers, suppliers, factory owners, governments, activist groups and/or competitors) through a variety of channels, including internal and external communications (via the VF intranet, VFC.com, newsletters and emails, town hall meetings, etc.). All VF vendors must access and comply with all VF documents – including the Terms of Engagement and Code of business conduct – posted on the Preferred Vendor Website. Each VF factory must undergo compliance training and display compliance posters outlining VF's human rights expectation in the local language for all workers to read'. In addition, it indicates that 'Our global compliance principles and commitments are disseminated widely across different audiences through our code of conduct, website, press releases and internally through our intranet website & weekly program video content.' However, there is no further information describing proactive communication actions focus on local communities and potentially affected stakeholders. [CHRB submission 2016, 2016 & 2019 CHRB Supplemental Response, 21/06/2019: business-humanrights.org] • Not met: How policy commitments are made accessible to audience
B.1.4.b	Communication /dissemination of policy commitment(s) to business relationships	2	The individual elements of the assessment are met or not as follows: Score 1 • Met: Commits to all 4 ILO core conventions for suppliers: See indicator A.1.2 • Met: Requiring AP suppliers to communicate policy down the chain: The Company indicates in the CHRB submission that 'VF communicates its human rights policy commitments through manufacturing agreements with all suppliers'. In its Terms of Engagement, the Company indicates: 'Each of the Company s contractors, suppliers and agents, agrees that, by accepting orders from the Company or any of its subsidiaries, it will abide by and implement these Terms of Engagement [which include ILO core areas within the document] and require the same from each of its VF approved and authorized subcontractors.' [CHRB submission 2016, 2016 & Terms of Engagement, 05/2019: s3.amazonaws.com] Score 2 • Met: How HR commitments made binding/contractual: In addition, the Company indicates: 'VF's Master Manufacturing Terms and Conditions assert that all VF vendors/suppliers are subject to the terms of agreement, including VF's Terms of Engagement and Global Compliance principles. VF further communicates these commitments through the Preferred Vendor Website. All vendors/suppliers are required to comply with all documents and notices posted on the Preferred Vendor Website (Master Manufacturing Terms and Conditions section 12.5). These agreements contain contractual language regarding compliance, and must be signed by all manufacturers prior to beginning work on VF products'. [CHRB submission 2016, 2016 & Terms of Engagement, 05/2019: s3.amazonaws.com] • Met: Including on AP suppliers: As indicated above, 'Each of the Company s contractors, suppliers and agents, agrees that, by accepting orders from the

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			Company or any of its subsidiaries, it will abide by and implement these Terms of Engagement and require the same from each of its VF approved and authorized subcontractors.' [CHRB submission 2016, 2016 & Terms of Engagement, 05/2019: s3.amazonaws.com]
B.1.5	Training on 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: Scores at least 1 on A.1.2: See indicator A.1.2 • Not met: Trains all workers on HR policy commitments: VF associates complete online and facilitator-led training on our Code of Business Conduct and sign an agreement to abide by its principles, including those related to human trafficking and forced labor. However, it is not clear that all ILO core are covered in the training, as the Code of Business Conduct does not included them all, and only makes a reference to the Company's Global Compliance Principles. Training including global compliance principles seems to cover employees related to monitoring its compliance. [Code of Business Conduct, 20/06/2019: d1io3yog0oux5.cloudfront.net & Modern slavery act disclosure statement (website), 06/2018: vfc.com] • Met: Trains relevant AP managers including procurement: The Company indicates in its CHRB submission that 'the VF Compliance team conducts internal and external training on human rights policy'. In the 'Know the Chain' response the Company also states that 'This training covers our Sourcing Teams, Licensees, 3rd party audit companies and our Internal Audit Team. The training is conducted in person. The scope varies depending upon the group, needs, or changes that may have taken place within the audit program'. Basic training covers, among other topics: 'The Global Compliance Principles', 'The Audit Procedure: Audit Scope, Designations and Cadence', 'Examples of Compliance Issues' and 'Corrective Action Plans'. [CHRB submission 2016, 2016 & Know the Chain: s3.amazonaws.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Score of 2 on A.1.2: See indicator A1.2 • Not met: Both requirements under score 1 met
B.1.6	Monitoring and corrective actions	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: Scores at least 1 on A.1.2 • Met: Monitoring implementation of HR policy commitments: The Company indicates in the CHRB submission that 'VF's Sustainable Operations team monitors for potential violations and follows up with all factories (owned and contracted) where a potential violation was identified. If a violation is confirmed, VF works with the factory to develop a corrective action plan and follows up to ensure expectations are met.' In its S&R Report 2016, the Company indicates: 'Factory audits are conducted by VF authorized compliance auditors or by an accredited third-party audit company. The inspections can be unannounced and last between six hours and two days. Each audit includes a thorough facility inspection for health and safety, environmental issues, social compliance and presence of forced labor or human trafficking. Factory records involving payroll, operating licenses, employee personnel records and other vital information are also reviewed for compliance with local laws. Auditors conduct employee interviews that provide added insight into the facility's working conditions, including hiring practices, wages and hours, worker management communications, worker treatment and environmental issues.' [CHRB submission 2016, 2016 & Sustainability and Responsibility Report 2016, 2016: s3.amazonaws.com] • Met: Monitoring AP suppliers: See above. In its S&R Report 2016, the Company indicates: 'We ensure adherence to our Terms of Engagement by conducting ongoing Factory Compliance Audits at every contract supplier facility. If a supplier or agent fails to comply with the Terms, VF will re-evaluate and possibly terminate its relationship with the organization. Our first choice, however, is to work with the organization to improve with the goal of achieving full compliance. Our Compliance team tracks trending issues and develops a quarterly report for our Sourcing teams to guide sourcing and remediation efforts as needed'. [CHRB submission 2016, 2016 & Sustainability and Responsibility Report 2016, 2016: s3.amazonaws.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Score of 2 on A.1.2 • Not met: Describes corrective action process: In its S&R Report 2016, the Company states: 'The factory compliance audit team follows up within 10 working days of an audit with a detailed Factory Compliance report. This report includes a Corrective Action Plan (CAP), which addresses problems noted during the audit and offers additional guidance from our team on how to improve the factory. Depending on the severity of the problems, a follow-up audit is scheduled to ensure compliance. We do not tolerate falsified records, mistreatment of

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>employees or a lack of effort to correct a known issue. We will cancel any outstanding contracts or license agreements if a rejected factory is used for VF or related licensed production. We also terminate outstanding engagements if a factory fails to follow through on agreed facility upgrades as outlined in their CAP'. However, there is no information about the total number of incidences and the number of times the corrective actions plans were needed. [Sustainability and Responsibility Report 2016, 2016: s3.amazonaws.com]</p> <ul style="list-style-type: none"> • Met: Example of corrective action: The Company discloses 2 examples of Corrective Action Plan (CAP) in CHRB Platform. In the first case the factory was rejected due to critical issues, such as: improper management of labor contracts, low level on social insurance contribution, inadequate annual leaves for workers in heavy and hazardous job, [...]. As a result the factory was not approved for VF branded production. In the second case, the factory presented some areas of non-compliance: 'inadequate weekly rest, and inadequate security practice.' In this case de factory was 'expected to remediate compliance findings in a timely and continuous manner by the next audit date.' [Factory Compliance Findings Report - example, N/A: business-humanrights.org & Factory Compliance Findings Report - example 2, N/A: business-humanrights.org] • Met: Discloses % of AP supply chain monitored: The Company indicated in its CHRB Submission 2016: 'VF evaluates 100% of its tier 1 suppliers and approximately 70% of tier 2 suppliers annually and makes decisions to exit suppliers when necessary'. In addition, the Company discloses some figures about audit findings results in its S&R Report 2016, such as: 'Approximately 2% of all 2016 contract supplier audit findings were identified as being significant, or "Critical." Most of these findings (45%) were issued to non-compliance with our Global Compliance Policy on the timely payment and record keeping of wages and benefit'. [Sustainability and Responsibility Report 2016, 2016: s3.amazonaws.com]
B.1.7	Engaging business relationships	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: HR affects AP selection of suppliers: In its 'Factory Compliance Audit Procedure' document, the Company states: 'No production can commence until a factory audit has taken place with a positive result and VF's Terms of Engagement has been signed'. [Factory Compliance Audit Procedure for Vendors, Factories, Buyers, Agents, and Licensees, 08/2019: s3.amazonaws.com] • Met: HR affects on-going AP supplier relationships: It also states: 'Violation of this policy may result in the termination of any existing contracts or licensing agreements.' In addition, in its S&R Report 2016, the Company indicates: 'Depending on the severity of the problems, a follow-up audit is scheduled to ensure compliance. We do not tolerate falsified records, mistreatment of employees or a lack of effort to correct a known issue. We will cancel any outstanding contracts or license agreements if a rejected factory is used for VF or related licensed production. We also terminate outstanding engagements if a factory fails to follow through on agreed facility upgrades as outlined in their CAP'. [Factory Compliance Audit Procedure for Vendors, Factories, Buyers, Agents, and Licensees, 08/2019: s3.amazonaws.com & Sustainability and Responsibility Report 2016, 2016: s3.amazonaws.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Both requirement under score 1 met • Met: Working with AP suppliers to improve performance: On its website section 'Worker well-being', the Company indicates: 'Stemming from our work as a founding member of the Alliance for Bangladesh Worker Safety, we developed a Critical Life Safety model that addresses structural, electrical and fire safety risks at our contract supplier factories. Our Sustainable Operations Team advises factory management as they improve the integrity of their facility and embed a safety-first mindset throughout their workforce', 'We partner with industry associations and NGOs to tip the scale of best practice across our industry. With the support of the Sustainable Trade Initiative (IDH), a Dutch foundation, and other industry partners, we collectively founded and funded the Life and Building Safety (LABS) initiative to systematically improve structural, electrical and fire safety in garment factories. Since inception in 2017, several brands and organizations have joined LABS. The initiative focuses on garment factories in Vietnam and India through 2018 and will then expand to other countries in 2019 and beyond'. [Worker wellbeing, 03/2019: sustainability.vfc.com]
B.1.8	Approach to engagement with potentially	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: Stakeholder process or systems: In its S&R Report 2016, the Company describes its stakeholder engagement approach: 'VF interacts with a wide range of stakeholder groups - from NGOs and shareholders, to local and national

Indicator Code	Indicator name	Score (out of 2)	Explanation
	affected stakeholders		<p>government and community groups. We define stakeholders as those who affect and/or are affected by our business operations [...]. Our stakeholders hold us accountable, help us understand and overcome persistent barriers to progress, stay ahead of opportunities, and create and share best practices'. It states that 'the apparel industry is often one of the first industries to enter in developing countries. In many cases, these countries lack the laws, policies, standards or infrastructure needed to support safe and healthy working environments. As one of the world's largest apparel and footwear companies, we understand our opportunity to set up stable and safe working environments and our contract supplier factories'.</p> <p>However, it is not clear what are the process and system the company uses to identify these stakeholders [Worker wellbeing, 03/2019: sustainability.vfc.com & Sustainability and Responsibility Report 2016, 2016: s3.amazonaws.com]</p> <ul style="list-style-type: none"> • Met: Frequency and triggers for engagement: It also indicates: 'We engage with key stakeholders at least once per year to continually understand the scope of our business risks and their expectations for our reporting of performance. At the beginning of 2017, we conducted a thorough stakeholder engagement review and materiality assessment to help inform this report. We engage on an as-needed basis as projects and programs are assessed and developed'. [Sustainability and Responsibility Report 2016, 2016: s3.amazonaws.com] • Met: Workers in AP SC engaged: On its website section 'Workers wellbeing', the Company gives evidence of how it engage with suppliers' workers through its 'Worker & Community Development program': 'Core to the program is a needs-based approach that includes interviews with factory managers, workers, relevant local parties and international experts. Currently, our interventions are creating value in Bangladesh, Cambodia, the Dominican Republic and Vietnam. Our community-based solutions are expanding while the results of these programs inform a continuous improvement approach to our strategies.' [Worker wellbeing, 03/2019: sustainability.vfc.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Analysis of stakeholder views and company's actions on them: The Company provided feedback to CHRB disclosure platform. However, it was not material to award this indicator, which looks for evidence of stakeholders views on human rights, and how the Company takes them into account. [2019 CHRB Supplemental Response, 21/06/2019: business-humanrights.org]

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	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: Identifying risks in own operations: In its S&R Report 2016, the Company describes its process to identify material aspects & boundaries: 'The scope of our sustainability strategy and its impact is far reaching. It extends beyond the operations where we have direct ownership and control, and requires dedicated engagement of our supply chain professionals, business partners and expert stakeholders. [...] In 2017, we reviewed our 2014 materiality assessment to begin reassessment of our priority issues. We amended this list as a result of new developments in the apparel and footwear sector, a review of peer materiality assessments, ongoing dialogue with stakeholders, NGO questionnaires, and lifecycle assessment results. We then prioritized the list through engagement with key external stakeholder groups including: environmental and human-rights focused NGOs, ESG investment rating agencies, trade organizations and academics, as well as internal groups, including representatives from VF's major brands and regions, and our Supply Chain, Responsible Sourcing, Public Affairs and Marketing teams'. [Sustainability and Responsibility Report 2016, 2016: s3.amazonaws.com] • Met: Identifying risks in AP suppliers: See above [Sustainability and Responsibility Report 2016, 2016: s3.amazonaws.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Ongoing global risk identification: In its Sustainability and Responsibility Report 2016, the Company describes its process to review its human rights risks identification and assessment: 'In 2017, we reviewed our 2014 materiality assessment to begin reassessment of our priority issues. We amended this list as a result of new developments in the apparel and footwear sector, a review of

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>peer materiality assessments, ongoing dialogue with stakeholders, NGO questionnaires, and lifecycle assessment results. We then prioritized the list through engagement with key external stakeholder groups including: environmental and human-rights focused NGOs, ESG investment rating agencies, trade organizations and academics, as well as internal groups, including representatives from VF's major brands and regions, and our Supply Chain, Responsible Sourcing, Public Affairs and Marketing teams.' [Sustainability and Responsibility Report 2016, 2016: s3.amazonaws.com]</p> <ul style="list-style-type: none"> • Met: In consultation with stakeholders: See above [Sustainability and Responsibility Report 2016, 2016: s3.amazonaws.com] • Met: In consultation with HR experts: See above [Sustainability and Responsibility Report 2016, 2016: s3.amazonaws.com] • Met: Triggered by new circumstances: See above [Sustainability and Responsibility Report 2016, 2016: s3.amazonaws.com]
B.2.2	Assessing: Assessment of risks and impacts identified (salient risks and key industry risks)	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: Salient risk assessment (and context): Following the identification of material human rights issues, the Company states 'We then prioritized the list through engagement with key external stakeholder groups including: environmental and human-rights focused NGOs, ESG investment rating agencies, trade organizations and academics, as well as internal groups, including representatives from VF's major brands and regions, and our Supply Chain, Responsible Sourcing, Public Affairs and Marketing teams. We then calculated the significance of these issues through responses from each stakeholder group, where the importance of a given issue on the business and its social, environmental and economic impact was ranked and assigned a weighting. Interviews were then conducted to better understand stakeholder perspectives, determine the relative priority of each issue, and assist in the identification of solutions'. [Sustainability and Responsibility Report 2016, 2016: s3.amazonaws.com] • Met: Public disclosure of salient risks: The Company indicated in the CHRB submission 2016 that: 'As reflected in our materiality assessment and Global Compliance principles, the following human rights-related issues are deemed most salient: Global Compliance Principles: Legal and ethical business practices, child/juvenile labor, forced labor, wages and benefits, hours of work, freedom of association and collective bargaining, health and safety, non-discrimination, harassment, women's rights, subcontracting, monitoring and compliance, informed workplace, worker residence, facility security and environmental protection'. The Company also discloses in its S&R Report 2016 a prioritisation matrix which cover its significant S&R impacts, risks, and opportunities throughout the value chain, however it is not clear if this matrix is the result of the salient risk assessment or a process of identification. [Sustainability and Responsibility Report 2016, 2016: s3.amazonaws.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Both requirements under score 1 met
B.2.3	Integrating and Acting: Integrating assessment findings internally and taking appropriate action	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: Action Plans to mitigate risks: In its CHRB submission 2016 the Company stated that: 'All structural/electrical safety concerns, day of rest violations, emergency evacuations, working hours, or other potential human rights issues are monitored on an on-going basis. Every month, VF produces an internal report tracking all factory audit statuses and flagging any new potential issues for investigation. Factories are rated as accepted, meaning they meet all applicable VF standards, developmental, meaning they meet compliance requirements but are not yet fully activating all VF expectations, pending compliance, and pending rejection. Factories labelled "pending rejection" have 180 days to address any concerns before they are removed from VF's supply chain. VF tracks supplier status by department, brand, and location. The report also flags any upgrades or downgrades in factory performance from the previous month, and lists the category of issue (health and safety, environmental, labor and wages, or other). This allows VF to surface any relevant trends that could improve compliance efforts in the future. These issues are also monitored on the Company's own manufacturing operations. [CHRB submission 2016, 2016] • Met: Including in AP supply chain: See above [CHRB submission 2016, 2016] • Met: Example of Actions decided: Also in this document, the Company provided the following example on conclusions reached and actions taken as a result of assessment processes: 'Our due diligence process consistently yields lessons that are used to improve processes and systems on an ongoing basis. For example, at one factory, worker interviews conducted during a routine compliance audit found

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>that while the factory maintained strong Human Resources policies ensuring freedom of association, training of in-line supervisors was not as effective as it could be. Therefore, supervisors occasionally acted in a manner not consistent with factory policies. The Sustainable Operations team then worked with the factory to improve training of in-line supervisors. The team also shared the lesson with many other factories to scale impact'. [CHRB submission 2016, 2016]</p> <p>Score 2</p> <ul style="list-style-type: none"> • 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	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: System to check if Actions are effective: The Company indicated in the CHRB submission 2016 that 'VF tracks the effectiveness of actions taken to address human rights risks and impacts through follow-up compliance audits. The Compliance and Sustainable Operations teams work together to enhance interventions going forward, using monthly factory reports (described above) as a baseline for progress'. In addition, the Company discloses information in CHRB Platform about its Worker and Community Development program: 'VF's Worker and Community Development program's goal is to objectively improve the lives of 1 million workers by 2025. In the past year, the initiative at VF positively affected over 106,000 workers in 5 countries. The program is guided by a robust Theory of Change, accompanied by a quantitative Monitoring, Evaluation and Learning (MEL) framework, that provides VF management with a tool to assess each intervention's effectiveness. As a result of implementing robust MEL framework, VF is able to assure our Worker and Community Development interventions continuously create positive change for each beneficiary.' [CHRB submission 2016, 2016 & 2019 CHRB Supplemental Response, 21/06/2019: business-humanrights.org] • Not met: Lessons learnt from checking effectiveness <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirement under score 1 met
B.2.5	Communicating : Accounting for how human rights impacts are addressed	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Comms plan re identifying risks: The Company describes in its Sustainability report the process it followed to identify human rights risks and impacts. [Sustainability and Responsibility Report 2016, 2016: s3.amazonaws.com] • Met: Comms plan re assessing risks: The Company describes its process to review its assessment and discloses human rights salient risks (see b.2.2). [Sustainability and Responsibility Report 2016, 2016: s3.amazonaws.com] • Met: Comms plan re action plans for risks: The Company indicated in the CHRB submission 2016 that: 'VF ensures that stakeholders are able to access information on how the company addresses its human rights impacts by providing multiple mechanisms for reporting issues and receiving updates. In addition to its website and third-party provider website, stakeholders may also obtain information anonymously via phone, email and other written communication. VF has invested in ensuring the capability to effectively manage reported concerns by providing culture-based investigations training, developing materials in multiple languages and ensuring that reporting and follow-up are available in each reporting stakeholder's native language. On occasion, VF employees or third-party partners communicate directly with supplier workers to obtain or provide information on potential human rights issues or other concerns'. [Sustainability and Responsibility Report 2016, 2016: s3.amazonaws.com] • Not met: Comms plan re reviewing action plans: Although the Company monitors how effective is being in taking action, no evidence found on how it communicates externally about how well it has addressed these risks. [Sustainability and Responsibility Report 2016, 2016: s3.amazonaws.com & CHRB submission 2016, 2016] • Not met: Including AP suppliers: No evidence found on how the company communicates externally with suppliers the four steps. [Sustainability and Responsibility Report 2016, 2016: s3.amazonaws.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Responding to affected stakeholders concerns: The Company indicates: 'During the past year, an interested stakeholder brought an issue to VF's attention about an underlying cultural practice in a supply chain factory that undermined the rights of certain workers. VF immediately assigned an internal team to respond to this situation. In addition, VF pulled together a multi-brand and multi-stakeholder group to provide additional scale to responding to the situation. VF provided funding to the group, while also acting in a leadership capacity to build a framework of policies and activities to prevent the situation from occurring.' [2019 CHRB Supplemental Response, 21/06/2019: business-humanrights.org]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			• 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	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: Channel accessible to all workers: In its Code of Business Conduct, the Company indicates: 'The Ethics Helpline is free, confidential and available 24 hours a day, 7 days a week around the world. If you don't want to identify yourself, you can make a report anonymously where allowed by law'. If you call from outside US, the Company indicates to visit a website platform named 'Ethics Point' which is 'a comprehensive and confidential reporting tool to assist management and employees to work together to address fraud, abuse, and other misconduct in the workplace, all while cultivating a positive work environment.' This channel is available to all employees working directly for VF Corporation and covers human rights issues included in its Code of Business Conduct such or the law. [Code of Business Conduct, 20/06/2019: d1io3yog0oux5.cloudfront.net & Ethics Point: secure.ethicspoint.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Number grievances filed, addressed or resolved: On its website page section about 'Ethics Compliance', the Company indicates: 'VF investigated a total of 694 reports globally in 2017, received through the Ethics Helpline and direct reporting to the Company via our Open Door Policy. Fifty two percent of the reports received were made anonymously. Out of the 694 total reports, 67 were requests for guidance. Approximately 44% of the reports containing allegations were found to be substantiated. All substantiated reports resulted in either training, coaching, policy review or disciplinary action.' However, it is not clear how many of these refer to human rights. [Ethics Compliance: vfc.com] • Met: Channel is available in all appropriate languages: Its Ethics Point platform is available in 14 languages, including Chinese, Arabic, Polish, Romanian and Bengali. In addition, its Ethics Helpline is available in 'over 100 languages'. [Ethics Point: secure.ethicspoint.com & Ethics Compliance: vfc.com] • Met: Expect AP supplier to have equivalent grievance systems: In its 'Facility Guidelines' document, which every supplier has to accept in order to contract with VF, the Company states: 'The facility must have processes in place to address associate grievances (suggestion box, open door policy, communications committee, etc.). This grievance mechanism must be accessible, predictable, reasonable, transparent, confidential, and based on engagement and dialogue. A resolution history of associate complaints and strikes must be maintained and be available for review.' [Facility Guidelines: s3.amazonaws.com] • Met: Opens own system to AP supplier workers: In its website section 'Ethics Compliance' the Company indicates: 'Our Ethics Helpline is not only available to VF associates. Anyone who wishes to raise a concern about a potential violation of our Code of Business Conduct or the law can contact the Helpline 24 hours a day/seven days a week.' [Ethics Compliance: vfc.com]
C.2	Grievance channel(s)/mechanism(s) to receive complaints or concerns from external individuals and communities	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: Grievance mechanism for community: In its website section 'Ethics Compliance', the Company indicates: 'VF is committed to fostering dialogue and communication through multiple channels, including our Open Door Policy and our Ethics Helpline. The Helpline is a free, confidential way for anyone to seek guidance, ask a question or raise a concern. It is available 24 hours a day/seven days a week in every country where VF has employees. Reporters can contact the Helpline in over 100 languages, and anonymous reporting is available where allowed by law. [...] Our Ethics Helpline is not only available to VF associates. Anyone who wishes to raise a concern about a potential violation of our Code of Business Conduct or the law can contact the Helpline 24 hours a day/seven days a week.' [Ethics Compliance: vfc.com & Sustainability and Responsibility Report 2016, 2016: s3.amazonaws.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Describes accessibility and local languages: See above [Ethics Compliance: vfc.com] • Met: Expects AP supplier to have community grievance systems: In its Facility Guidelines the Company indicates: 'The facility must have processes in place to address associate grievances (suggestion box, open door policy, communications committee, etc.). This grievance mechanism must be accessible, predictable, reasonable, transparent, confidential, and based on engagement and dialogue'. However, it is not indicated whether they convey the same expectation to their

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>suppliers, or whether communities and individuals affected by suppliers' operations have access to this grievance channel. [CHRB submission 2016, 2016]</p> <ul style="list-style-type: none"> • Met: AP supplier communities use global system: As indicated above, the Company's Ethics Helpline 'is not only available to VF associates. Anyone who wishes to raise a concern about a potential violation of our Code of Business Conduct or the law can contact the Helpline 24 hours a day/seven days a week.', including external communities complaining about joint venture partners or contractors. [Ethics Compliance: vfc.com]
C.3	Users are involved in the design and performance of the channel(s)/mechanism(s)	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: Engages users to create or assess system • Met: Description of how they do this: The Company indicates in the CHRB submission that 'VF regularly engages potential and actual users in the design and implementation of its grievance channels. VF uses periodic surveys and provides an open channel to receive feedback on its ethics reporting mechanisms. In addition, the Company indicates: 'In 2015 and 2016, based on input received from VF associates, VF simplified its online reporting and case management tool and added a quality control review process for every issue tracked via the case management system. In our supply chain, we work closely with the Alliance for Worker Safety and our suppliers and created The Bangladesh worker hotline: +880 9666771166.' [CHRB submission 2016, 2016] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Engages with users on system performance: The Company indicates on its website section 'Ethics Compliance', that it does an annual internal investigation summary where it review quantitative and qualitative data related to received reports through the Ethics Helpline and direct reporting to the Company via its Open Door Policy: 'We use this data, both qualitative and quantitative, to help guide our actions and ensure they are aligned with our vision and values. This includes working to identify areas of opportunity, improving upon our policies, processes, and best practices and creating occasions to provide additional training and resources within our organization. With these actions, we commit to furthering our Open Door culture and ensuring we act with integrity for our shareholders, our customers and our associates.' However, there is no further information about how this action represent an engagement with users on system performance. [Ethics Compliance: vfc.com] • Not met: Provides user engagement example on performance • Not met: AP suppliers consult users in creation or assessment: The Company does not disclose documents indicating whether it expects its suppliers to consult potential and/or actual users on the design, implementation, or performance of their channels/mechanisms.
C.4	Procedures related to the mechanism(s)/channel(s) are publicly available and explained	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: Response timescales: The Company states in the CHRB submission that: 'When contact information is provided, reporters receive acknowledgement within 48 hours.' It also indicates: 'VF averages 23 days to close each report, compared with a recommended benchmark of 30 days. Each case receives a quality control review to ensure compliance with VF's investigation protocol'. [CHRB submission 2016, 2016] • Met: How complainants will be informed: It also indicates: 'Stakeholders receive communications in their stated preferred language, including a close-out message at the end of each investigation.' [CHRB submission 2016, 2016] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Escalation to senior/independent level: The Company indicates that: 'Issues are triggered and categorized and an escalation matrix is provided to each investigator to ensure issues are raised with senior management as appropriate'. In addition, in its Audit Committee Charter, the Company states: 'When any member of the Committee receives a report of evidence of a material violation or any report under VF's Professional Conduct Policy of a possible violation of law (a "report"), such member shall bring such matter to the Chairman. The Chairman shall document the receipt and substance of the report in a log and maintain a copy of any written report received. The Chairman shall then promptly bring the report to the attention of the full Committee. Upon receipt of a report, the Committee shall (a) inform VF's chief legal officer ("CLO") and chief executive officer ("CEO") (or the equivalents thereof) of such report unless such notification would be futile; and (b) determine whether an investigation is necessary regarding any report of evidence of a material violation by VF, its subsidiaries or any of their officers, directors, employees or agents. If the Committee determines an investigation is necessary or appropriate, the Committee shall (a) notify the full board of directors; (b) initiate an

Indicator Code	Indicator name	Score (out of 2)	Explanation
			investigation, which may be conducted either by the CLO or by outside attorneys; and (c) retain such expert personnel as the Committee deems' [Sustainability and Responsibility Report 2016, 2016: s3.amazonaws.com & Audit Committee Charter, 2017: d1io3yog0oux5.cloudfront.net]
C.5	Commitment to non-retaliation over complaints or concerns made	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: Public statement prohibiting retaliation: The Company indicates in the CHRB submission that 'VF has a strict non-retaliation policy and does not tolerate retaliation toward anyone for raising a concern, coming forth with a good-faith report, or participating in an investigation. VF has not brought a retaliatory suit or fired an employee for raising a human rights violation concern. [CHRB submission 2016, 2016] • Met: Practical measures to prevent retaliation: It also indicates: 'All reports of human rights issues and other concerns are handled confidentially and reporters may raise concerns anonymously. Each reporter that raises a concern via the Ethics Helpline receives a report number and passcode allowing further confidential communication with the assigned investigator.' In addition, the Company indicates in its S&R Report 2016: 'We also provide external, third-party managed mechanisms for suspected violations to be reported via our Ethics Helpline. This helpline is a free, confidential service where reports can be submitted anonymously where allowed by law.' [CHRB submission 2016, 2016 & Sustainability and Responsibility Report 2016, 2016: s3.amazonaws.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Has not retaliated in practice: In its response to CHRB assessment the Company also states that 'VF has not brought a retaliatory suit against any lawyer for representing persons that raised concerns of human rights violations, nor engaged in violent acts or threats'. [CHRB submission 2016, 2016] • Not met: Expects AP suppliers to prohibit retaliation: VF's Global Compliance Principles also contain provisions prohibiting suppliers from taking retaliatory action against workers', however it does not prohibit retaliation against other stakeholders. [Global Compliance Principles (website), 04/2019: sustainability.vfc.com]
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	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: Describes how remedy has been provided: In its CHRB submission the Company indicates: 'There is a system in place to ensure that subject-matter experts across the organization are communicated with quickly to address matters of interest or concern. Third-parties are consulted. Advisor views are enlisted. Due diligence is completed. Recent situations have included responses to concerns in Bangladesh, including an instance of supplier misconduct associated with violence and freedom of association, concerns associated with freedom of association and collective bargaining in Honduras, and a plant safety incident in Swaziland. [...] <p>There is more work to be done to streamline the approach, but a framework is in place and is improved upon based on learnings from each situation and the expertise and guidance of credible 3rd parties'. On its website section 'Bangladesh FAQs', the Company describes its actions to remedy safety issues in Bangladesh factories: 'As a founding member of the Alliance for Bangladesh Worker Safety and through our own independent efforts such as our Responsible Sourcing program, VF is taking action every day to improve the working conditions in factories where we make or source our products, demonstrating our long-term global commitment to worker safety.' Each year, the Alliance for Bangladesh publish a remediation progress report [CHRB submission 2016, 2016 & Alliance for Bangladesh Worker Safty - Annual Report, 11/2017: bangladeshworkersafety.org]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Met: Changes introduced to stop repetition: The Company states in its Disclosure to CHRB Platform: 'Safety is non-negotiable at VF. We have integrated our learnings from the safety-related incidents at factories in Bangladesh into our supply chain activities, significantly reducing the risk of future safety-related occurrences. VF

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>was a founding member of the Alliance for Bangladesh Worker Safety in Bangladesh, driving remediation through all our suppliers in Bangladesh. VF was instrumental in the creation of Nirapon, a successor organization to the Alliance. VF leadership in both initiatives in Bangladesh is reinforced through our election to the Board of Directors and consistent leadership activities. Leveraging our learnings from Bangladesh, VF collaborated with other apparel brands to create the Life and Building Safety initiative (LABS, labsinitiative.com), which has extended the safety inspections from Bangladesh to Vietnam and India. Continuing with our leadership role in these initiatives, VF has been elected to the LABS Executive Steering Committee. Each of these initiatives aims to protect workers from preventable structure, fire, and electrical safety risks in apparel and footwear producing factories.' In addition the Company quotes the Alliance for Bangladesh Progress - Statistics website, to indicate the changes introduced to stop repetition in safety matters: 'All Alliance factories are required to undergo inspections (structural, fire, and electrical) by a qualified assessment firm before producing for our members. These assessments provide factory owners with a technical understanding of the fire safety and structural concerns related to their facilities and lead to the development of a Corrective Action Plan (CAP). After the inspection, factory representatives attend a CAP meeting in the Alliance office to go over the inspection results and align on an approved CAP, which will guide factory management on the actions needed to remediate each non-compliance (NC) and improve safety conditions for their garment workers. Alliance factories are expected to continue remediation in order to achieve CAP completion by July 2018. Remediation verification visits (RVVs) are conducted to verify progress on remediation as per the factory's original CAP. Each factory will receive at least three verification visits before going through a CAP Closure Verification Visit to confirm that all findings from their initial CAP are closed. The Alliance categorizes non-compliances (NCs) by both priority level (high, medium, and low) and discipline (electrical, fire, and structural). Remediation progress can be seen within each priority level and discipline by showing whether NCs are completed, in progress, or not started, as verified onsite during RVVs. Factories that fail to make adequate progress, especially in remediation of high-priority NCs, are submitted to the Alliance escalation process. Escalation indicates that members and factories must take immediate action to ensure remediation issues are quickly addressed. If adequate progress is not made within the specified timeframe, escalated factories will be suspended and removed from the Alliance compliant factory list.' [Alliance Progress - Statistics, 08/2018: bangladeshworkersafety.org & 2019 CHR B Supplemental Response, 21/06/2019: business-humanrights.org]</p> <ul style="list-style-type: none"> • 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.a	Living wage (in own production or manufacturing operations)	0	<p>The individual elements of the assessment are met or not as follows: Score 1</p> <ul style="list-style-type: none"> • Not met: Living wage target timeframe: In its Global Compliance Principles, the Company indicates: 'must compensate their employees fairly by providing compensation packages comprised of wages and benefits that, at the very least, comply with legally mandated minimum standards or the prevailing industry wage, whichever is higher, and shall provide any benefits required by law. Employees must be fully compensated at a premium rate for overtime according to local law and each employee must be provided with a clear, written accounting for each pay period. Where compensation does not meet workers' basic needs and provide some discretionary income VF Authorized Facilities should work with VF to make improvements and take other appropriate actions that seek to progressively realize a level of compensation that does.' However there is no reference to family/dependents.

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>In the CHRB submission, the Company also indicates that 'VF also has a number of programs in place that support community-based services to bridge any gaps in a worker's ability to meet their basic needs, including access to food, water, clothing and shelter. We are working closely with NGO partners, factory owners and workers to advance living wages and safer, more efficient production practices for long-term success. Through our Third Way initiative, we partner with our suppliers and NGOs to share best practices not only in manufacturing but also in improving worker safety and ensuring fair treatment of employees. We have Third Way partners across the globe including Cambodia, Bangladesh, Dominican Republic and Kenya. Our work in Cambodia is an especially excellent example of our commitment, where it has evolved into a full-scale community project. Working with an Italian NGO, Mission Possible, to identify areas of need. Through the partnership, VF provides Kipling backpacks for children, has set up a mobile clinic to increase access to healthcare and supports school nutrition programs. VF plans to work with the school to offer English, sports and arts classes'. However, the Company does not disclose if it has targets for paying all workers a 'living wage' nor describes how it determines a living wage for the regions where they operate (including involvement of relevant trade unions). [Global Compliance Principles (website), 04/2019: sustainability.vfc.com & CHRB submission 2016, 2016]</p> <ul style="list-style-type: none"> • Not met: Describes how living wage determined: The Company worked with SAI (Social Accountability International) to determine how VF wages compare to living wage benchmarks domestically and internationally. It scoped owned factories, suppliers, distribution centers and retail stores. It then created a working group to review lessons, outcomes and best practices. However, no further details found, including how it actually determines a living wage for regions where it operates, including the involvement of trade unions or equivalent worker bodies. [CHRB submission 2016, 2016 & 2019 CHRB Supplemental Response, 21/06/2019: business-humanrights.org] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Achieved payment of living wage [CHRB submission 2016, 2016] • Not met: Regularly review definition of living wage with unions [CHRB submission 2016, 2016]
D.2.1.b	Living wage (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: Living wage in supplier code or contracts: In its Global Compliance Principles, the Company indicates: 'All VF Authorized Facilities must compensate their employees fairly by providing compensation packages comprised of wages and benefits that, at the very least, comply with legally mandated minimum standards or the prevailing industry wage, whichever is higher, and shall provide legally mandated benefits. Employees must be fully compensated for overtime according to local law and each employee must be provided with a clear, written accounting for each pay period. Where compensation does not meet workers' basic needs and provide some discretionary income VF Authorized Facilities should work with VF to make improvements and take other appropriate actions that seek to progressively realize a level of compensation that does.' However there is no reference to living wage or a wage which is sufficient to cover the worker and its family basic needs and discretionary income. [Global Compliance Principles (website), 04/2019: sustainability.vfc.com & Facility Guidelines: s3.amazonaws.com] • Met: Improving living wage practices of suppliers: The Company indicates in its Global Compliance Principles that 'Where compensation does not meet workers' basic needs and provide some discretionary income VF Authorized Facilities should work with VF to make improvements and take other appropriate actions that seek to progressively realize a level of compensation that does.' In addition, in its disclosure to CHRB Platform, the Company states: 'VF has previously worked with Social Accountability International (SAI), a global leader in implementing human rights at work, to determine how VF wages compare to living wage benchmarks domestically and internationally. The SAI project scoped 26 locations; 3 owned manufacturing locations, 2 strategic suppliers, 3 distribution centers, and 18 retail stores. VF has formed an internal living wage working group that will review lessons, outcomes and best practices from the SAI project.' [Global Compliance Principles (website), 04/2019: sustainability.vfc.com & 2019 CHRB Supplemental Response, 21/06/2019: business-humanrights.org] <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

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.2.2	Aligning purchasing decisions with 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: Avoids business model pressure on HRs: In its Know the Chain disclosure, the Company indicates: 'VF's global supply chain includes a department called "supply planning." This department is responsible for knowing the capacity of all factories in our supply chain, and estimating the percent of production available to VF. The sourcing personnel throughout VF's supply chain must consult VF's supply planning team prior to placing an order, ensuring our order does not overload the capacity of that factory. Should a factory produce more than 50% of their capacity for VF, this supplier is required to operate in an enhanced partnership manner with VF. Moreover, VF takes great strides to minimize fluctuations in our orders to suppliers. We recognize our industry operates in high and low seasons, however given VF's size and scale, we are able to work closely with our key suppliers to "level-load" our orders in their factories. [Know the Chain: s3.amazonaws.com] • 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
D.2.3	Mapping and disclosing the supply chain	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: Identifies suppliers back to product source: The Company indicates in the CHRB submission 2016 that 'VF maps all tier-1 suppliers, all subcontractors, and all nominated tier-2 suppliers. All of these suppliers are also evaluated against the VF Vendor Scorecard. The company also maps the supply chain for key materials including down, leather and metal parts'. [CHRB submission 2016, 2016] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Discloses significant parts of supply chain and why: The Company discloses on its website information about 'all VF-owned and operated and direct-sourced Tier-1 and sub-contractor factories used by VF for the period of 2018's Quarter 4 (October - December)' including name, location, product type and employees. And it indicates: 'VF's current supplier factory list does not include licensee or Tier-2 (raw material) factories but will continue to be expanded on a regular basis.' [Factory Disclosure list- 4Q 2018, 2018 & Factory List, 03/2019: sustainability.vfc.com]
D.2.4.a	Prohibition on child labour: Age verification and corrective actions (in own production or manufacturing operations)	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: Does not use child labour: In the CHRB submission, the Company states that: 'All VF operations and suppliers are subject to our Global Compliance Principles.' As stated in Principle 2: 'No person shall be employed at an age younger than 15 or under the age for completing compulsory education in the country of manufacture, whichever is higher. VF Authorized Facilities must observe all legal requirements for work of employees under 18 years of age, particularly those pertaining to hours of work and working conditions.' It also indicates that 'Because these expectations are part of our the Terms of engagement, they are subject to verification as part of our standard auditing procedures.' [CHRB submission 2016, 2016 & Global Compliance Principles (website), 04/2019: sustainability.vfc.com] • Met: Age verification of job applicants and workers: In its Facility Guidelines, applied for owned and contracted Facilities, the Company indicates: 'A child labor policy must be established, and human resources personnel must be made aware of the policy requirements and be well trained in its application. Vigorous age verification must be part of this process, including stringent checks on the legitimacy of documentation. In countries where a national identity card is not available, two forms of age verification documents are required such as medical records, dental records, driver's license, right to vote card, etc. At least one of these documents must contain a photo ID.' [Facility Guidelines: s3.amazonaws.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> • Met: Remediation if children identified: In its S&R Report 2016 the Company states: 'VF focuses on child labor prevention and remediation efforts across our Tier 1 and nominated Tier 2 facilities and within our cotton supply chain. [...] During 2016, 16 contract supplier factories were rejected for incidents of non-compliance with our Child/Juvenile Labor policy. Audit findings related to this policy represented approximately 0.5% of all findings.' In addition, in its CHRB Submission, the Company indicates: 'If child labor is discovered in a factory audit, VF connects with the organization, Center for Children's Rights. The solution often used in this type of situation is to put the child in school, provide them a stipend, and then offer them a job when they come of age.' [Sustainability and Responsibility Report 2016, 2016: s3.amazonaws.com & CHRB submission 2016, 2016]
D.2.4.b	Prohibition on child labour: Age verification and corrective actions (in the supply chain)	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Child Labour rules in codes or contracts: In its Global Compliance Principles, the Company states: 'No person shall be employed at an age younger than 15 or under the age for completing compulsory education in the country of manufacture, whichever is higher. VF Authorized Facilities must observe all legal requirements for work of employees under 18 years of age, particularly those pertaining to hours of work and working conditions.' In addition in its S&R Report 2016, the Company indicates: 'To become a VF Authorized Facility, a supplier must sign and abide by our Terms of Engagement document, indicating their acceptance of our Global Compliance Principles as well as pass our detailed Factory Compliance Guidelines.' [Global Compliance Principles (website), 04/2019: sustainability.vfc.com & Sustainability and Responsibility Report 2016, 2016: s3.amazonaws.com] • Met: How working with suppliers on child labour: In its S&R Report 2016 the Company states: 'VF focuses on child labor prevention and remediation efforts across our Tier 1 and nominated Tier 2 facilities and within our cotton supply chain. [...] We ensure adherence to our Terms of Engagement by conducting ongoing Factory Compliance Audits at every contract supplier facility. If a supplier or agent fails to comply with the Terms, VF will re-evaluate and possibly terminate its relationship with the organization. Our first choice, however, is to work with the organization to improve with the goal of achieving full compliance. [...] During 2016, 16 contract supplier factories were rejected for incidents of non-compliance with our Child/Juvenile Labor policy. Audit findings related to this policy represented approximately 0.5% of all findings.' In addition, in its Submission to CHRB, the Company shows how it is working with suppliers on child labour issues: 'Re -examining its hiring procedures to ensure that workers under 16 years old are not hired. Setting up a young worker protection policy to ensure all young workers are registered in a local labor bureau and provided with a regular health check once they are hired. [...] If child labor is discovered in a factory audit, VF connects with the organization, Centre for Children's Rights. The solution often used in this type of situation is to put the child in school, provide them a stipend, and then offer them a job when they come of age.' [Sustainability and Responsibility Report 2016, 2016: s3.amazonaws.com & CHRB submission 2016, 2016] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Both requirements under score 1 met • Not met: Provide analysis of trends demonstrating progress: In its S&R Report 2016 the Company indicates: 'Our Compliance team tracks trending issues and develops a quarterly report to guide sourcing and remediation efforts as needed.' However, these reports are not public. [Sustainability and Responsibility Report 2016, 2016: s3.amazonaws.com]
D.2.5.a	Prohibition on forced labour: Debt bondage and other unacceptable financial costs (in own production or manufacturing operations)	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: Pays workers in full and on time: In its Facility Guidelines, the Company indicates: 'The facility and recruitment agencies may not deduct from wages (by way of garnishments, levies, deposits, guaranteed monies or otherwise) costs or fees associated with employment, including required visas, health checks, employment registration, work permit, management fee, or recruitment agency/placement firm fees greater than one month of the base salary. [...] Payroll payments, including payments for associates who have resigned, must be made within the legal time limit.' [Facility Guidelines: s3.amazonaws.com] • Met: Payslips show any legitimate deductions: It also states: 'Associates must regularly receive a written pay slip, in an understandable format, in the local language when the payroll is distributed. A translation key must be provided for those associates not able to read the local language.' [Facility Guidelines: s3.amazonaws.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> Met: How these practices are implemented and monitored for agencies, labour brokers or recruiters: The references describe how the Company monitors its facilities in order to ensure the compliance of its Global Compliance Principles and Guidelines. In addition, the Company indicates in its disclosure to CHRB Platform that 'VF does not employ any associates in our owned operations through brokers or agencies.' [Facility Guidelines: s3.amazonaws.com & 2019 CHRB Supplemental Response, 21/06/2019: business-humanrights.org]
D.2.5.b	Prohibition on forced labour: Debt bondage and other unacceptable financial costs (in the supply chain)	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: Debt and fees rules in codes or contracts: Its Global Compliance Principles states: 'VF Authorized Facilities shall not use involuntary or forced labor, including indentured labor, bonded labor or any other form of forced labor, including human trafficking. [...] Employees must be fully compensated at a premium rate for overtime according to local law and each employee must be provided with a clear, written accounting for each pay period.' In its Facility Guidelines there are clear requirements regarding these issues: 'The facility must not use or participate in recruitment or employment practice that indentures or bonds an associate to the workplace or which obtains labor or services using force, fraud, or coercion.[...]The facility and recruitment agencies may not deduct from wages (by way of garnishments, levies, deposits, guaranteed monies or otherwise) costs or fees associated with employment, including required visas, health checks, employment registration, work permit, management fee, or recruitment agency/placement firm fees greater than one month of the base salary.[...] The facility must not deduct wages for work equipment, including uniforms, and basic needs such as water and first aid. Deductions for accommodations and food must only be made with the express consent of the associate and at a fair rate as allowed by law or stated in the associate's contract, whichever is lower.' [Global Compliance Principles (website), 04/2019: sustainability.vfc.com & Facility Guidelines: s3.amazonaws.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Met: How working with suppliers on debt & fees: The Company indicates in its Disclosure to CHRB Platform that 'As part of VF's continuous improvement efforts regarding advancing labor rights across our supply chain, VF recently reviewed recruitment processes for migrant workers. Our review was conducted through on-site investigations, worker interviews, and engagement with migrant worker hiring agency officials. The result from our review illustrated the need for eliminating recruitment costs and fees to workers as a key way of promoting ethical recruitment. VF is a signatory to the American Apparel and Footwear Association (AAFA) and Fair Labor Association (FLA)'s Commitment to Responsible Sourcing. As an industry and as an individual company, we are committed to the fair treatment of workers in the apparel, footwear, and travel goods supply chains. One important part of this ongoing effort is working together to eliminate conditions that can lead to forced labor in the countries from which we source products. We commit to working with our global supply chain partners to create conditions so that: Workers do not pay for their job; Workers retain control of their travel documents and have full freedom of movement; All workers are informed of the basic terms of their employment before leaving home VF is incorporating the Commitment to Responsible Recruitment into our social compliance standards, which will be publicly refreshed prior to December 31, 2019. As part of this effort, VF recently partnered with the International Organization for Migration (IOM) under its Corporate Responsibility in Eliminating Slavery and Trafficking (CREST) initiative. Our focus in this partnership is to reduce exploitative and unethical recruitment and labor practices in garment and footwear supply chains by promoting the employer pays principle. In collaboration with another large footwear brand, IOM creates tools and training materials, as well as implements a training-of-trainers (ToT) approach to creating lasting change. Vietnam and the Philippines were identified as important countries of origin for migrant workers in our Asian supply chains and are the locations of our initial roll out. The long-term goal of this program will be ensuring agencies meet the International Recruitment Integrity System (IRIS) standard, a social compliance scheme designed to promote ethical international recruitment.' In addition, in its 2018 Disclosure in CHRB Platform, the Company indicates: 'We have signed the Mekong Forced Labor Pledge and are currently engaged with the group in supplier audits in China to understand how we can improve our processes for identifying and responding to forced labor. Examples of corrective action plans implemented when violations of Principle 3 occur might include requiring the supplier to establish a written policy against forced labor, requiring that a log of accepted overtime be maintained, requiring that a factory keep a copy of relevant orientation materials regarding overtime, requiring that a factory develop a procedure to communicate working hours and limitations, etc.' [CHRB Submission 2018, 22/08/2018: business-humanrights.org & 2019 CHRB Supplemental Response, 21/06/2019: business-humanrights.org] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Both requirements under score 1 met [CHRB Submission 2018, 22/08/2018: business-humanrights.org] • Met: Provide analysis of trends in progress made: According to the Disclosure in CHRB Platform, the Company indicates: 'et: Analysis of trends amongst suppliers 2016 to 2017 saw a 14% decrease in the identification of Forced Labor findings.' [CHRB Submission 2018, 22/08/2018: business-humanrights.org]
D.2.5.c	Prohibition on forced labour: Restrictions on workers (in own production or manufacturing operations)	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: Does not retain documents or restrict movement: In its Facility Guidelines, the Company states: 'Associates must not be required to deposit their original identity papers such as travel or residency permits with their employer unless expressly stated by country law. [...] The facility must allow associates to move freely within their designated work areas during work hours, including being allowed access to drinking water and toilet facilities. Associates must be allowed to leave the facility during meal periods and after work hours.' [Facility Guidelines: s3.amazonaws.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: How sure about agencies or brokers: The Company indicates in its Facility Guidelines that: 'Third party recruiters, employment agents, and labor brokers are expressly prohibited from holding associates' identity documents. Neither these recruitment agencies nor the employer may hold other associate documents such as land titles.'. In addition the Company states that it 'does not employ any associates in our owned operations through brokers or agencies.' [Facility Guidelines: s3.amazonaws.com & 2019 CHRB Supplemental Response, 21/06/2019: business-humanrights.org]

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.2.5.d	Prohibition on forced labour: Restrictions on workers (in the supply chain)	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: Free movement rules in codes or contracts: The Global Compliance Principles and its Facility Guidelines apply not only for suppliers but for also for own manufacture operations. In its Facility Guidelines, the Company states: 'Associates must not be required to deposit their original identity papers such as travel or residency permits with their employer unless expressly stated by country law. [...] The facility must allow associates to move freely within their designated work areas during work hours, including being allowed access to drinking water and toilet facilities. Associates must be allowed to leave the facility during meal periods and after work hours.' [Facility Guidelines: s3.amazonaws.com] • Met: How these practices are implemented and monitored for agencies, labour brokers or recruiters: The Company indicates in its Disclosure to CHRB Platform: 'As part of VF's continuous improvement efforts regarding advancing labor rights across our supply chain, VF recently reviewed recruitment processes for migrant workers. Our review was conducted through on-site investigations, worker interviews, and engagement with migrant worker hiring agency officials. The result from our review illustrated the need for eliminating recruitment costs and fees to workers as a key way of promoting ethical recruitment. [...] One important part of this ongoing effort is working together to eliminate conditions that can lead to forced labor in the countries from which we source products. We commit to working with our global supply chain partners to create conditions so that: Workers do not pay for their job; Workers retain control of their travel documents and have full freedom of movement; All workers are informed of the basic terms of their employment before leaving home [...] As part of this effort, VF recently partnered with the International Organization for Migration (IOM) under its Corporate Responsibility in Eliminating Slavery and Trafficking (CREST) initiative. Our focus in this partnership is to reduce exploitative and unethical recruitment and labor practices in garment and footwear supply chains by promoting the employer pays principle. In collaboration with another large footwear brand, IOM creates tools and training materials, as well as implements a training-of-trainers (ToT) approach to creating lasting change. Vietnam and the Philippines were identified as important countries of origin for migrant workers in our Asian supply chains and are the locations of our initial roll out. The long-term goal of this program will be ensuring agencies meet the International Recruitment Integrity System (IRIS) standard, a social compliance scheme designed to promote ethical international recruitment.' [2019 CHRB Supplemental Response, 21/06/2019: business-humanrights.org] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Both requirements under score 1 met • Met: Provide analysis of trends in progress made: According to the Disclosure in CHRB Platform, the Company indicates: 'Analysis of trends amongst suppliers 2016 to 2017 saw a 14% decrease in the identification of Forced Labor findings.' [CHRB Submission 2018, 22/08/2018: business-humanrights.org]
D.2.6.a	Freedom of association and collective bargaining (in own production or manufacturing operations)	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: Commits not to interfere with union rights and collective bargaining and prohibits intimidation and retaliation: In its Global Compliance Principles, the Company states: 'VF Authorized Facilities shall obtain and comply with current information on local and national laws and regulations regarding Freedom of Association and Collective Bargaining. No employee shall be subject to harassment, intimidation or retaliation in their efforts to freely associate or bargain collectively.' [Global Compliance Principles (website), 04/2019: sustainability.vfc.com] • Not met: Discloses % covered by collective bargaining: In its S&R Report 2016, the Company indicates: 'Approximately 750 associates (or .012%) in the U.S. were covered by collective bargaining agreements at the end of 2016. With the divestiture of the Licensed Sports Group (LSG) brands in 2017, this is no longer the case. In international markets, a significant percentage of associates are covered by trade-sponsored or governmental bargaining arrangements. Associate Trade Union relations are considered to be good.' In addition, in its Disclosure to CHRB Platform, the Company discloses information from its other facilities: 'Our owned manufacturing takes place in Mexico, Honduras and the Dominican Republic. Of those associates, 100% in Mexico are covered under collective bargaining while 0% in Honduras and the Dominican republic are not [cover under collective bargaining].' It is not clear yet, however, the total percentage of the Company's workforce covered by collective bargaining agreements. [Sustainability and Responsibility Report 2016, 2016: s3.amazonaws.com & 2019 CHRB Supplemental Response, 21/06/2019: business-humanrights.org]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			Score 2 • Not met: Both requirement under score 1 met
D.2.6.b	Freedom of association and collective bargaining (in the supply chain)	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: FoA & CB rules in codes or contracts: In its Global Compliance Principles, which are part of the Terms of Engagement between the Company and any facility which produces its products (owned or contracted), the Company states: 'VF Authorized Facilities shall recognize and respect the right of employees to freedom of association and collective bargaining. No employee shall be subject to harassment, intimidation or retaliation in their efforts to freely associate or bargain collectively.' In addition, in its CHRB Scoresheet 2017, the Company indicates: 'All factories that produce VF branded apparel and footwear must ensure that the people who make our products are guaranteed certain essential rights: the right to fair compensation; the right to associate freely and bargain collectively; the right to work free from discrimination and harassment; and the right to a safe, clean workplace. We regard these rights as non-negotiable imperatives in the workplace regardless of location'. [Global Compliance Principles (website), 04/2019: sustainability.vfc.com & CHRB Company Scoresheet 2017, 2017: s3.amazonaws.com] • Not met: How working with suppliers on FoA and CB <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met • Met: Provide analysis of trends in progress made: The Company indicates in its Disclosure to CHRB Platform that 'In China and Vietnam, 26% of our suppliers have active unions, of which 82% of the workers in those suppliers are members. Outside of China and Vietnam, unions are less prevalent with only 17% of our suppliers having unions, of which 73% of the workers are union members. VF performs audits and activities to assure suppliers provide employees information regarding local and national laws and regulations regarding Freedom of Association and Collective Bargaining. Audits also determine if employees have been subject to harassment, intimidation or retaliation in their efforts to freely associate or bargain collectively. The VF factory compliance team also confirms whether a facility has mechanisms in place to receive and respond timely to worker grievances. From 2018 to 2019, VF identified an increase in harassment of union workers through our onsite assessments. We believe this increase is in response to VF's increased education on workers' freedom of association and collective bargaining rights. Any failed findings against these code provisions generate a Corrective Action Plan and require the supplier to remediate all identified deficiencies.' [2019 CHRB Supplemental Response, 21/06/2019: business-humanrights.org]
D.2.7.a	Health and safety: Fatalities, lost days, injury rates (in own production of manufacturing operations)	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: Injury Rate disclosures: In its S&R Report 2016, the Company discloses some figures about accidents in its own operations such as: global accident rate: 791 in 2016, and DART rate in US region 3,11 (days away, restricted or transferred). [Sustainability and Responsibility Report 2016, 2016: s3.amazonaws.com] • Not met: Lost days or near miss disclosure: See above. The figure disclosed is only for U.S. region, it does not cover all its own operations. [Sustainability and Responsibility Report 2016, 2016: s3.amazonaws.com] • Met: Fatalities disclosures: In addition it reports that there were no fatalities in its owned and operated manufacturing and distribution centers. [Sustainability and Responsibility Report 2016, 2016: s3.amazonaws.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> • Not met: Set targets for H&S performance: The Company states that: 'As a responsible company focused on the health and well-being of its employees, VF tracks safety KPI's and sets strategies that aid in injury reduction and safety culture enhancement. All of our safety targets are focused on improving safety and encouraging proactive actions that prevent injuries from ever occurring. These are targets such as safety action item closure, training, preventative measures taken and reporting timeliness. We do not place targets on injury reduction as such targets may foster a culture of underreporting (and setting injury rate targets is becoming illegal in some countries). Instead, our hard targets relate to behaviors that impact injury reduction, and only use injury data and trends to guide our efforts. VF is constantly enhancing our health and safety metrics to include addition leading indicators, such as near miss reports to injury ratios. Again, we are diligent in setting health and safety strategies and targets that encourage action before an injury, continuously evolving our safety program.' However, indicator looks for specific targets related to rates of injury, lost days and fatalities for the reporting period. [2019 CHRB Supplemental Response, 21/06/2019: business-humanrights.org] • Not met: Met targets or explains why not
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 Global Compliance Principles, which are part of the Terms of Engagement between the Company and any facility which produces its products (owned or contracted), the Company states: 'VF Authorized Facilities must provide their employees with a clean, safe and healthy work environment, designed to prevent accidents and injury to health arising out of or occurring during the course of work. VF Authorized Facilities are required to comply with all applicable, legally mandated standards for workplace health and safety in the countries and communities in which they operate.' In addition, in its Facility Guidelines document, which also apply to all facilities (owned or contracted), the Company sets out clear health and safety requirements such as: 'The facility's health and safety program must include policies and procedures, associate awareness training, safety meetings, accident reviews, injury and illness prevention, risk assessments, and a comprehensive review of occupational health standards by job type (noise, air, light, and ergonomics). [...] <p>The facility must have adequate health and safety training programs for their building configuration and production processes. Facility personnel must be trained on health and safety issues. [...] There must be at least one easily accessible, fully stocked First Aid kit per 100 associates on each production floor. If kits are locked to prevent theft, the keys must be readily available.', among others. [Global Compliance Principles (website), 04/2019: sustainability.vfc.com & Facility Guidelines: s3.amazonaws.com]</p> <ul style="list-style-type: none"> • 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"> • Met: How working with suppliers on H&S: On its website section 'Workers Wellbeing', the Company indicates: 'Stemming from our work as a founding member of the Alliance for Bangladesh Worker Safety, we developed a Critical Life Safety model that addresses structural, electrical and fire safety risks at our contract supplier factories. Our Sustainable Operations Team advises factory management as they improve the integrity of their facility and embed a safety-first mindset throughout their workforce'. [Worker wellbeing, 03/2019: sustainability.vfc.com] • Met: Provide analysis of trends in progress made: According to its Disclosure to CHRB Platform, the Company indicates: '2016 to 2017 saw a 9% increase in the identification of Health & Safety findings.' [CHRB Submission 2018, 22/08/2018: business-humanrights.org]

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.2.8.a	Women's rights (in own production or manufacturing operations)	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: Process to stop harassment and violence: The Company includes a principle against Harassment in its Global Compliance Principles. In addition, it states in its Disclosure to CHRB Platform that 'is dedicated to creating a harassment-free environment through policy, guidance documents and trainings for associates. This includes a Respectful Workplace Policy (available in 11 languages) and manager resources to provide guidance to managers on many aspects of creating and maintaining a harassment-free workplace. Topics covered in our policy and resources include, but are not limited to, bystander interventions and speaking up and more often. VF requires all associates with managerial accountability to attend an annual, mandatory 2-hour harassment prevention training. Additionally, where an associate may feel uncomfortable speaking to their manager, VF's Ethics Helpline provides the aggrieved individual with access to anonymous reporting, 24 hours per day, 7 days per week, managed by a third-party provider. Every report to VF's Ethics Helpline is investigated.' Harassment free policy includes sexual harassment and discrimination based on sex '(including pregnancy, childbirth, breastfeeding or related medical conditions)'. [2019 CHRB Supplemental Response, 21/06/2019: business-humanrights.org & Harassment Free, 01/01/2018: business-humanrights.org] • Met: Working conditions take account of gender: In its Facility Guidelines, the Company indicates that the Facilities should have 'Separate facilities for men and women (clearly marked)'; ' Associates will not be exposed to hazards, including glues and solvents, that may endanger their safety, including their reproductive health. Facilities shall provide appropriate services and accommodation to women associates in connection with pregnancy.' [Facility Guidelines: s3.amazonaws.com] • Met: Equality of opportunity at all levels: In its Global Compliance Principles, the Company states: 'VF Authorized Facilities must ensure that women workers will receive equal remuneration, including benefits, equal treatment, equal evaluation of the quality of their work and equal opportunity to fill all positions open to male workers.' In addition in its Facility Guidelines document, the Company indicates: 'The facility must have a women rights policy which ensures that female associates receive equal remuneration including benefits, equal treatment, equal evaluation of the quality of their work, and an equal opportunity to fill all positions. All associates must be trained on this policy. [...] Women will not be exposed to hazards, including glues and solvents, which may endanger their health, including their reproductive health.', among others. [Global Compliance Principles (website), 04/2019: sustainability.vfc.com & Facility Guidelines: s3.amazonaws.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Meets all of the requirements under score 1
D.2.8.b	Women's rights (in the supply chain)	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Women's rights in codes or contracts: In its Global Compliance Principles, which are part of the Terms of Engagement between the Company and any facility which produces its products (owned or contracted), the Company states: 'VF Authorized Facilities must ensure that women workers receive equal remuneration, including benefits, equal treatment, equal evaluation of the quality of their work and equal opportunity to fill all positions open to male workers.' In addition in its Facility Guidelines document, which also apply to all facilities (owned or contracted), the Company indicates: 'The facility must have a women rights policy which ensures that female associates receive equal remuneration including benefits, equal treatment, equal evaluation of the quality of their work, and an equal opportunity to fill all positions. All associates must be trained on this policy. [...] Women will not be exposed to hazards, including glues and solvents, which may endanger their health, including their reproductive health.', among others. [Global Compliance Principles (website), 04/2019: sustainability.vfc.com & Facility Guidelines: s3.amazonaws.com] • Not met: How working with suppliers on women's rights: 'Women's Health in Bangladesh' <p>In Bangladesh, approximately 80 percent of garment workers are female and they often have limited access to quality women's health care. VF joined the BSR HERhealth program in 2017 to pilot the organization's recommended approach toward this issue at two supplier facilities in Bangladesh. HERhealth has demonstrated positive impacts on worker knowledge, behaviour, and ability to access needed health products and services, with a particular focus on personal and feminine hygiene, family planning, maternity health and preventive care. However, it is not clear how companies are working with supplier to improve women's rights. [Her Project - Her Health: herproject.org]</p>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirement under score 1 met • Met: Provide analysis of trends in progress made: According to its Disclosure in CHRB Platform, the Company indicates: '2016 to 2017 saw a 14% increase in the identification of Women's Rights findings' [CHRB Submission 2018, 22/08/2018: business-humanrights.org]
D.2.9.a	Working hours (in own production or manufacturing operations)	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: Respects max hours, min breaks and rest periods in its own operations: In its Global Compliance Principles, the Company states: 'Employees must not be required, except in extraordinary circumstances, to work more than sixty hours per week including overtime or the local legal requirement, whichever is less. A regular work week shall not exceed 48 hours. All overtime must be consensual and not requested on a regular basis. All employees will be entitled to at least 24 hours of consecutive rest in every seven-day period.' In addition, in its Facility Guidelines, the Company indicates: 'The facility must ensure that associate hours worked do not exceed 60 hours per week including overtime, or greater than the legal limit. All overtime must be voluntary. The facility must have an internal policy that states associates are free to decline over time. Associates must also be given adequate notice of future planned overtime work'; 'The facility must provide rest and meal breaks as required by law. For countries with no legally required breaks, a 30 minute unpaid break must be provided during an 8-hour workday' [Facility Guidelines: s3.amazonaws.com & Global Compliance Principles (website), 04/2019: sustainability.vfc.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: How it implements and checks this: During audits, the Facility Guidelines are used to verify and examine for violations, this document includes the following: 'All hourly and production associates must use a time clock, swipe card, biometric scanner, or another reliable mechanical device, to record their start and stop times. If manual time records are used, the associates must approve/initial the time cards. The associates themselves must do the process of punching in and out. The facility must also provide access to associates' attendance records upon request' [Facility Guidelines: s3.amazonaws.com]
D.2.9.b	Working hours (in the supply chain)	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Working hours in codes or contracts: In its Global Compliance Principles, the Company states: 'Employees must not be required, except in extraordinary circumstances, to work more than sixty hours per week including overtime or the local legal requirement, whichever is less. A regular work week shall not exceed 48 hours. All overtime must be consensual and not requested on a regular basis. All employees will be entitled to at least 24 hours of consecutive rest in every seven-day period.' In addition, in its Facility Guidelines, the Company indicates: 'The facility must ensure that associate hours worked do not exceed 60 hours per week including overtime, or greater than the legal limit. All overtime must be voluntary. The facility must have an internal policy that states associates are free to decline over time. Associates must also be given adequate notice of future planned overtime work'; 'The facility must provide rest and meal breaks as required by law. For countries with no legally required breaks, a 30 minute unpaid break must be provided during an 8-hour workday' [Global Compliance Principles (website), 04/2019: sustainability.vfc.com & Facility Guidelines: s3.amazonaws.com] • Not met: How working with suppliers on working hours: Although the Company states that it 'will only do business with contractors, suppliers and agents that comply with the applicable laws and regulations of the jurisdictions in which they operate. VF Authorized Facilities must comply with the legal limitations on regular and overtime hours in the jurisdiction in which they manufacture.', CHRB could not find further information describing how it works with suppliers to improve their practices in relation to working hours. [2019 CHRB Supplemental Response, 21/06/2019: business-humanrights.org] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met • Met: Provide analysis of trends in progress made: According to its Disclosure to CHRB Platform, the Company indicates: '2016 to 2017 saw a 5% increase in the identification of Hours of Work findings.' [CHRB Submission 2018, 22/08/2018: business-humanrights.org]

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: SOMO report accuses large clothing brands such as H&M, Gap, VF of having their clothes made in Bangladesh by suppliers where working hours exceed 60 hours a week. • Area: Working hours • Story: A 2017 report by the Centre for Research on Multinational Corporations (SOMO) has accused clothing brands such as VF, Gap and H&M of having their clothes made in Bangladesh by suppliers where working hours exceed 60 hours a week. Working weeks exceeding 60 hours were reported at eight factories of companies supplying brands including: C&A, H&M, VF Corporation, Gap and Kmart. Some workers were reportedly being forced to do additional overtime, having to regularly work until midnight and being paid for additional hours separately in cash. Even when overtime payments were included in the wages, not one of the interviewed workers earned a living wage. The average total take-home salary was only a third of what would constitute a living wage. • Sources: [SOMO Report January 2017: stopkinderarbeid.nl]
E(1).1	The Company has responded publicly to the allegation	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Public response available <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Response goes into detail
E(1).2	The Company has appropriate policies in place	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Company policies address the general issues raised • Met: Policies apply to the type of business relationships involved <p>Score 2</p> <ul style="list-style-type: none"> • Met: Policies address the specific rights in question: The Company's Global Compliance principles cover all ILO core areas and they 'apply to all facilities that produce goods for VF Corporation, or any of its subsidiaries, divisions, or affiliates, including facilities owned and operated by VF and its contractors, agents and suppliers herein referred to as VF Authorized Facilities'. In addition, the Company also has a principle covering hours of work that indicates 'VF authorized Facilities must ensure employees hours worked shall not, on a regularly scheduled basis, exceed the lesser of (a) the legal limitations on regular and overtime hours in the jurisdiction in which they manufacture of (b) 60 hours per week including overtime (except in extraordinary business circumstances). Global compliance principles also covers subcontracting: 'VF Authorized Facilities will not utilize subcontractors in the manufacturing of VF products or components without VF's written approval and only after the subcontractors has agreed to comply with the Terms of engagement, including these Global Compliance Principles.
E(1).3	The Company has taken 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: Engages with affected stakeholders • Not met: Encourages linked business to engage affected stakeholders • Not met: Provides remedies to affected stakeholders • Not met: Has reviewed management systems to prevent recurrence <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Remedies are satisfactory to the victims • Not met: Has improved systems and engaged affected stakeholders
E(2).0	Serious allegation No 2		<ul style="list-style-type: none"> • Headline: Cambodian factory workers suffer mass faintings • Area: H&S and Working hours • Story: In June 2017, The Observer and Danish investigative media site Danwatch reported that more than 500 workers in four factories have been hospitalised over the previous year. Women who collapsed worked 10 hour days, six days a week and the temperature in the factories hit 37 degrees celsius. Puma, Nike, VF Corporation and Asics were contacted by the Observer and said they had investigated the episodes. • Sources: [Danwatch - 25/06/2017: old.danwatch.dk][The Guardian - 25/06/2017: theguardian.com]
E(2).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: A company spokesperson stated "It is of absolute importance to VF that all workers in our supplier factories are operating in safe, healthy environments where human rights are respected. Our teams work hard to make certain that working conditions in our contract supplier factories, including temperature or working breaks, are followed per local laws and regulations". [Mass faintings afflict the women who sew our clothes, 24/06/2017:

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>old.danwatch.dk & Cambodian female workers in Nike, Asics and Puma factories suffer mass faintings, 25/06/2017: theguardian.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Response goes into detail: The company has not provided a detailed response to the allegation.
E(2).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: In regards to health and safety, the company states “VF Authorized Facilities must fully comply with all applicable laws of the countries in which they are located including all laws, regulations and rules relating to wages, hours, employment, labor, health and safety, the environment, immigration, and the apparel industry.” The company has a policy on working hours for VF Authorized Facilities. [Terms of Engagement: s3.amazonaws.com] • Met: Policies apply to the type of business relationships involved: The company’s Terms of Engagement policy indicates that by accepting orders from VF or its subsidiaries, all contractors, suppliers and agents “will abide by and implement these Terms of Engagement and require the same from each of its VF approved and authorized subcontractors.” [Terms of Engagement: s3.amazonaws.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Policies address the specific rights in question: The company’s Global Compliance Principles states “VF Authorized Facilities must fully comply with all applicable local, state, federal, national, and international laws, rules and regulations including those relating to wages, hours, employment, labor, health and safety, the environment, immigration and the apparel and footwear industry.” In regards to health and safety data, the company provides injury data for company-owned and operated manufacturing and distribution centers, but does not provide the same data on its suppliers. [Terms of Engagement: s3.amazonaws.com & Global Compliance Principles: business-humanrights.org]
E(2).3	The Company has taken 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: Engages with affected stakeholders: There is no evidence to suggest that VF has engaged with affected stakeholders. • Not met: Encourages linked business to engage affected stakeholders: There is no evidence to suggest that VF has encouraged linked businesses to engage with affected stakeholders. • Not met: Provides remedies to affected stakeholders: There is no evidence to suggest that VF has provided remedies to affected stakeholders. • Not met: Has reviewed management systems to prevent recurrence: The company states that it uses a third-party to conduct life safety assessments on its suppliers. However, there is no evidence that the company reviewed management systems following the related allegations. <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Remedies are satisfactory to the victims: There is no evidence that the company has provided remedies to the victims. • Not met: Has improved systems and engaged affected stakeholders: There is no evidence to suggest that VF has improved systems or engaged affected stakeholders.

F. Transparency (10% of Total)

Indicator Code	Indicator name	Score	Explanation
F.1	Company willingness to publish information	3.58 out of 4	Out of a total of 48 indicators assessed under sections A-D of the benchmark, VF made data public that met one or more elements of the methodology in 43 cases, leading to a disclosure score of 3.58 out of 4 points.
F.2	Recognised Reporting Initiatives	2 out of 2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 2</p> <ul style="list-style-type: none"> • Met: Company reports on GRI: Company's S&R Report 2016 uses GRI Guidelines and includes a GRI Index. [Sustainability and Responsibility Report 2016, 2016: s3.amazonaws.com]
F.3	Key, High Quality Disclosures	0.8 out of 4	VF met 2 of the 10 thresholds listed below and therefore gets 0.8 out of 4 points for the high quality disclosure indicator. Specificity and use of concrete examples

Indicator Code	Indicator name	Score	Explanation
			<ul style="list-style-type: none"> • Met: Score 2 for A.2.2 : Board discussions • Not met: Score 2 for B.1.6 : Monitoring and corrective actions • 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 : Remedying 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 • Not met: Score 1 for D.2.1.a : Living wage (in own production or manufacturing operations) • Not met: Score 2 for D.2.7.a : Health and safety: Fatalities, lost days, injury rates (in own production of manufacturing operations)

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.