

Corporate Human Rights Benchmark 2017 Company Scoresheet



Company Name VF  
 Industry Apparel (Supply Chain and Own Operations)  
 Overall Score 37

Theme Score	Out of	For Theme
1	5	A.1 POLICY COMMITMENTS
0.8	5	A.2 BOARD LEVEL ACCOUNTABILITY
4.7	10	B.1 EMBEDDING RESPECT FOR HUMAN RIGHTS IN COMPANY CULTURE AND MANAGEMENT SYSTEMS
7.5	15	B.2 HUMAN RIGHTS DUE DILIGENCE
7.5	15	C. REMEDIES AND GRIEVANCE MECHANISMS
3.5	20	D. ENABLING FACTORS AND BUSINESS PROCESSES
7.5	20	E. PERFORMANCE: RESPONSES TO SERIOUS ALLEGATIONS
4.6	10	F. TRANSPARENCY

Detailed assessments

Measurement theme	Indicator Code	Indicator name	Score	Explanation	Sources
A.1 POLICY COMMITMENTS	A.1.1	Commitment to respect human rights	0	The Company indicates in the CHRBC submission that 'we adopted an initial set of 12 principles in 1996 - a number we have since increased to 16 in order to keep pace with evolving standards and expectations. The principles are consistent with the core labor standards established by Worldwide Responsible Accredited Production, the Fair Labor Association and the International Labor Organization's Declaration on Fundamental Rights and Principles at Work. They also meet the expectations set by the OECD guidelines on human rights'. However, the Company has not disclosed a formal policy committing explicitly to 'respect human rights', the ten principles of the UNGC, the UDHR, the International Bill of Human Rights, the UN Guiding Principles on Business and Human Rights or the OECD guidelines for MNEs.	Submission to the CHRBC Disclosure Platform: 'CHRBC Response Spreadsheet'
A.1 POLICY COMMITMENTS	A.1.2	Commitment to respect the human rights of workers	2	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, regarding Health and Safety, principle 7 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'. Finally 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.	Global Compliance Principles
A.1 POLICY COMMITMENTS	A.1.3B	Commitment to respect human rights particularly relevant to the apparel industry	0	The Company's global compliance principles, that, as indicated above, cover suppliers, have a principle on women's rights which states that '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. 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 employment at the same rate or pay and benefits. Workers will not be forced or pressured to use contraception. Workers 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 workers in connection with pregnancy'. In relation to children's rights, the Company refers to the principle 2 on child labor, which indicates that 'no person shall be employed at an age younger than 15 (or 14 where consistent with International Labor Organization guidelines) or younger than the age for completing compulsory education in the country of manufacture where such age is higher than 15. All 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. However, it does not disclose a commitment on children's rights nor migrant rights. Regarding suppliers, the Company applies the same principles mentioned and therefore it has not disclosed policy commitments specifically on children's rights nor migrant rights. Finally, concerning water and sanitation, the Company indicates on its website, water availability and health section that: 'Our commitment to water conservation extends well beyond our facilities' doors. VF is also working in the communities where we live and work to provide access to clean water and preserve the natural beauty of the ocean'. 'VF brands are working to promote water conservation in their communities. VF is actively seeking ways to share lessons learned from these programs across the enterprise'. To provide access to clean	Global Compliance Principles Submission to the CHRBC Disclosure Platform: 'CHRBC Response Spreadsheet' Company website: 'Water availability and health'

A.1 POLICY COMMITMENTS	A.1.4	Commitment to engage with stakeholders	<p>1 In the CHRB submission, the Company indicates that 'As part of the audit process, VF regularly engages stakeholders, including union representatives, operators and managers. Beyond compliance, we are beginning to partner with governments and civil society to be part of advancing solutions that create opportunities for our associates and people in the communities where we live and work. In addition, 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. We will continue to firmly support efforts throughout our supply chain to advance a culture that empowers workers and improves the lives of those who contribute to the success of our industry'</p> <p>The Company does not disclose a commitment to engage with stakeholders and their legitimate representatives in the development or monitoring of its human rights approach.</p>	Submission to the CHRB Disclosure Platform: 'CHRB Response Spreadsheet'
A.1 POLICY COMMITMENTS	A.1.5	Commitment to remedy	<p>0 The Company indicates in the CHRB submission that 'VF's Terms of Engagement lay out our expectations of all VF authorized suppliers. IF these expectations are not met, factories are responsible for remediation. In 2014, as part of the Alliance for Worker Safety, VF formalized direct loans with the International Finance Corporation for remediation for workers in Bangladesh. We have also played an active role in contributing to social benefits in China. VF has an Open Door Policy to empower all to express concerns regarding discrimination and harassment. Under this policy, no associate will be penalized for voicing a question or concern. VF strictly prohibits any retaliation toward any associate for reporting a concern in good faith or for participating in an internal investigation'. However, despite indicating that it collaborates in initiatives that provide access to remedy, the Company does not disclose a publicly available statement of policy committing it to remedy adverse impacts on individuals, workers and communities.</p> <p>On its website, supplier training section, the Company indicates that 'Suppliers that experience difficulty meeting our compliance requirements are offered training and support from our sourcing teams or independent consultants, provided they demonstrate a commitment to meeting the goals set forth by the Program. If suppliers accept the offer, we work with them to further assess working conditions and remediate problems'.</p>	Submission to the CHRB Disclosure Platform: 'CHRB Response Spreadsheet' Company website: 'Supplier training'
A.1 POLICY COMMITMENTS	A.1.6	Commitment to respect the rights of human rights defenders	<p>0 Although the Company refers in its CHRB submission to the Global Compliance principles 6 and 9 of its 'Global Compliance Principles', which refer to freedom of association &amp; collective bargaining and harassment respectively, and to its 'Harassment-Free Work Environment Policy', neither this evidence nor other disclosed by the Company contain a specific statement regarding zero tolerance of threats, intimidation and attacks against human rights defenders.</p>	Submission to the CHRB Disclosure Platform: 'CHRB Response Spreadsheet'
A.2 BOARD LEVEL ACCOUNTABILITY	A.2.1	Commitment from the top	<p>0 The Company indicates in the CHRB submission that 'the Code of Conduct is approved by the Board of Directors. Material amendments to this Code must be approved by the VF's Board of Directors'. The Code of conduct refers to the global compliance principles, which contain the Company's commitments on human rights indicating the following: '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 the 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'. The Company does not indicate, however, whether there is a board member or committee tasked with specific governance oversight of one or more areas of respect for human rights.</p>	Submission to the CHRB Disclosure Platform: 'CHRB Response Spreadsheet' Code of business conduct
A.2 BOARD LEVEL ACCOUNTABILITY	A.2.2	Board discussions	<p>1 The Company indicates in the CHRB Submission that 'at their quarterly meetings, the Audit Committee of the Board of directors routinely reviews audit issues and trends resulting from inspections performed at all factories engaged in production of VF branded apparel and footwear. Issues discussed involve areas of non-compliance with VF's Global Compliance Principles that were cited on the audits. Follow-up action plans are monitored for timely and proper completion'. The Company does not provide, however, examples of human rights discussed at Board level or Board committee during Company's last reporting period.</p>	Submission to the CHRB Disclosure Platform: 'CHRB Response Spreadsheet'
A.2 BOARD LEVEL ACCOUNTABILITY	A.2.3	Incentives and performance management	<p>0 The Company indicates in the CHRB submissions that 'VF does not currently provide incentives to the Board linked to implementation of human rights policy commitments'.</p>	Submission to the CHRB Disclosure Platform: 'CHRB Response Spreadsheet'
B.1 EMBEDDING RESPECT FOR HUMAN RIGHTS IN COMPANY CULTURE AND MANAGEMENT SYSTEMS	B.1.1	Responsibility and resources for day-to-day human rights functions	<p>2 The Company indicates in its CHRB submission that 'Responsibility for human rights is inherent in the objectives of senior supply chain leaders at VF, including Tom Glaser, Vice President, VF Corporation &amp; President, Supply Chain. His responsibilities include the oversight of all of VF's global manufacturing, sourcing and operations and he has regular meetings with VP of HR, General Counsel, VP of Product, Sourcing and VP of Public Affairs to discuss human rights issues'. The Company's policy, Global Compliance Principles, covers all ILO core areas.</p> <p>In addition, in the 'Know the Chain' response, the Company indicates that 'The Factory Compliance Team reports to the VP of Internal Audit, Scott More, who reports directly to the Audit Committee'.</p> <p>Finally, the Company also indicates in its submission to CHRB that: 'VF makes a significant investment, via its recently formed Global Responsible Sourcing team, to improve our ability to prevent, mitigate, and/or remediate human rights issues. VF's Global Responsible Sourcing team has more than 100 members and is tasked with overseeing product quality and responsibility. VF responsible sourcing and sustainable operations job descriptions explicitly state that the purpose of the job is to be accountable for driving results and improvements in all responsible sourcing topics, including worker safety, chemistry, environmental and social sustainability, traceability and sustainable living environments'.</p>	Submissions to the CHRB Disclosure Platform: 'CHRB Response Spreadsheet' and 'Responses to CHRB Assessment and Questions' Company submission to KnowtheChain
B.1 EMBEDDING RESPECT FOR HUMAN RIGHTS IN COMPANY CULTURE AND MANAGEMENT SYSTEMS	B.1.2	Incentives and performance management	<p>0 The Company indicates in the CHRB submission that 'senior managers undergo annual performance evaluations against performance objectives.' However, it does not indicate whether these performance objectives include human rights or key industry risks. In addition, in the same document, it also indicates that 'all supply chain leaders have annual performance objectives linked to supply chain compliance performance'.</p>	Submission to the CHRB Disclosure Platform: 'CHRB Response Spreadsheet'

B.1 EMBEDDING RESPECT FOR HUMAN RIGHTS IN COMPANY CULTURE AND MANAGEMENT SYSTEMS	B.1.3	Integration with enterprise risk management	<p>1 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'.</p> <p>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.</p>	Submission to the CHRB Disclosure Platform: 'CHRB Response Spreadsheet'
B.1 EMBEDDING RESPECT FOR HUMAN RIGHTS IN COMPANY CULTURE AND MANAGEMENT SYSTEMS	B.1.4.a	Communication / dissemination of policy commitment(s) within Company's own operations	<p>1 The Company indicates in the CHRB submission that 'VF communicates its human rights policy commitments to employees and other stakeholders (it has clarified in its response to CHRB assessment that these include 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 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'.</p>	Submissions to the CHRB Disclosure Platform: 'CHRB Response Spreadsheet' and 'Responses to CHRB Assessment and Questions'
B.1 EMBEDDING RESPECT FOR HUMAN RIGHTS IN COMPANY CULTURE AND MANAGEMENT SYSTEMS	B.1.4.b	Communication / dissemination of policy commitment(s) to business relationships	<p>2 The Company indicates in the CHRB submission that 'VF communicates its human rights policy commitments through manufacturing agreements with all suppliers. 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'.</p>	Submission to the CHRB Disclosure Platform: 'CHRB Response Spreadsheet'
B.1 EMBEDDING RESPECT FOR HUMAN RIGHTS IN COMPANY CULTURE AND MANAGEMENT SYSTEMS	B.1.5	Training on human rights	<p>1 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'.</p>	Submission to the CHRB Disclosure Platform: 'CHRB Response Spreadsheet' Company submission to KnowtheChain
B.1 EMBEDDING RESPECT FOR HUMAN RIGHTS IN COMPANY CULTURE AND MANAGEMENT SYSTEMS	B.1.6	Monitoring and corrective actions	<p>1 The Company indicates in the CHRB submission that 'VF's Sustainable Operations team monitors for potential violations and follows up with all factories 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. 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 its response to CHRB assessment, also indicates that 'our monitoring and remediation across our owned manufacturing is guided by our Global Compliance Principles, which includes all ILO core areas. A total of 2,265 audits were conducted in 2015 across our supply chain and owned operations'.</p> <p>On its website, VF's auditing policy section the Company also describes its corrective action processes: 'After completing an inspection, our auditor verbally provides factory managers with the facilities' compliance designation and a written list of action items. The factory compliance audit team follows up within 10 working days with a detailed factory evaluation report. This report includes a Corrective Action Plan (CAP) to address problems noted during the audit and offers additional training and consultation from our team on how to improve the factory. We give the factory 180-270 days to implement the CAP. Depending on the severity of the problems, a follow-up audit is scheduled 180-270 days from the day of the initial audit to ensure compliance'. Although the Company discloses in its response to CHRB assessment some the percentage of critical incidences regarding ILO core, it does not disclose the total number of incidences.</p> <p>Finally, on its website, VF's auditing policy section the Company indicates that 'factory audits are conducted by a VF-authorized compliance auditor or by an accredited third-party audit company'. Audits of owned factories are carried out by the internal audit team. However, no further details disclosed regarding the use of third party/external monitors.</p>	Submissions to the CHRB Disclosure Platform: 'CHRB Response Spreadsheet' and 'Responses to CHRB Assessment and Questions' Company website: 'VF's auditing policy'

B.1 EMBEDDING RESPECT FOR HUMAN RIGHTS IN COMPANY CULTURE AND MANAGEMENT SYSTEMS	B.1.7	Engaging business relationships	<p>2 The Company indicates in the CHRB submission that 'the VF Compliance team evaluates all suppliers prior to entering into a business relationship. If the supplier does not meet VF requirements, VF will not engage. If performance at an existing supplier slips and efforts to correct the issue are unsuccessful, VF may slow or cease production at that factory'. In addition, on website: supplier training, it indicates the following: 'Before we begin working with a supplier, we introduce VF's Global Compliance Program and Factory Audit Procedures to the facility's management team. Supplier that experience difficulty meeting our compliance requirements are offered training and support from our sourcing teams or independent consultants, provided they demonstrate a commitment to meeting the goals set forth by the Program. If suppliers accept the offer, we work with them to further assess working conditions and remediate problems'.</p> <p>Also in this section the Company indicates the following: We recognize our responsibility to never tolerate violations of human rights in the factories where people work on our behalf to produce our products. Any violation of human rights concerning child/juvenile labor issues in our supply chain is unacceptable. VF immediately ceases all work with a facility if an audit reveals child/juvenile labor, involuntary or forced labor, minimum wage and incorrect overtime compensation, locked emergency exits, physical or verbal abuse, attempted bribes or falsified record. If, at a later date, the factory feels that it has taken the appropriate corrective action to merit another audit, we will reconsider the facility and conduct another audit. If a factory receives two consecutive "rejected" ratings, no further audits can be conducted until a waiting period of 12 months has elapsed'.</p> <p>Finally, in this same section of the website, it describes how it works with supplier to improve human rights performance following audits. For example, it indicates, regarding forced, labour, it states that: 'Approximately 3% of factories failed for issues related to forced labor. Sample action plans for factories found noncompliant with Global Compliance Principles 3 included: Refraining from retaining worker passports, bankbooks or any personal identification documents; returning the passport and stamp for bankbook to all migrant workers; and</p>	Submission to the CHRB Disclosure Platform: 'CHRB Response Spreadsheet' Company website: 'Supplier training'
B.1 EMBEDDING RESPECT FOR HUMAN RIGHTS IN COMPANY CULTURE AND MANAGEMENT SYSTEMS	B.1.8	Framework for engagement with potentially affected stakeholders	<p>0 The Company indicates in the CHRB Submission that: 'Our supply chain often extends into countries such as Bangladesh and Cambodia that have minimal government regulation and enforcement around human rights. Issues that can arise may include unsafe working conditions, no worker unionization, child and forced labor, human trafficking and minimal wages. We believe we have a responsibility to understand all of the dimensions of these human rights issues and implement lasting and impactful solutions. At the heart of our approach is our strong belief that every individual should be treated fairly and with respect. All our significant investment agreements and contracts include human rights clauses or undergo human rights screening, as defined in our Global Compliance Program. 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'. However, the Company does not describe the specific processes to identify affected stakeholders, nor describes the frequency and triggers for engagement on human rights issues by type or by stakeholder group. The Company does not provide an analysis of the inputs/views given by the stakeholders on human rights issues.</p>	Submission to the CHRB Disclosure Platform: 'CHRB Response Spreadsheet'
B.2 HUMAN RIGHTS DUE DILIGENCE	B.2.1	Identifying: Processes and triggers for identifying human rights risks and impacts	<p>0 The Company indicates in the CHRB submission that: 'VF engages with associations and governments to ensure VF's human rights expectations are understood whenever the company is considering market entry or revisiting existing sourcing strategies. As VF moves to Africa and begins to build its supplier base there, the Company is doing so with clear direction and expectations that all suppliers will be fully approved and operate in full alignment with VF expectations and policies. Recently, VF has engaged the Cambodian, Kenyan, and Ethiopian governments in human rights discussions'.</p> <p>However, although the Company discloses engagement with governments and associations when considering a market entry or revisits sourcing strategies, it does not disclose the processes and systems in place to identify risks and impacts on a regular basis across its activities, in consultation with affected and potentially affected stakeholders and/or independent external human rights experts. Also, it does not indicate whether its systems are triggered by new business relationships or changes in the human rights contexts in particular locations.</p>	Submission to the CHRB Disclosure Platform: 'CHRB Response Spreadsheet'

B.2 HUMAN RIGHTS DUE DILIGENCE	Assessing: Assessment of risks and impacts identified (salient risks and key industry risks)	<p>1 The Company indicates in the CHRB submission that: 'Human rights risks and impacts are a key part of all VF sourcing decisions. VF uses a vendor scorecard to evaluate potential human rights risks on an on-going basis. The scorecard takes factors like Fair Factories Clearinghouse and Higg Index scores into account. The total score determines whether the factory is categorized as good, average or poor. Factories that fail to attain minimum standards will be rejected. Once a factory is accepted as a VF vendor, they are subject to our Master Manufacturing Terms and Conditions. As stated in these terms, all vendors agree to comply with all documents and notices posted on our Preferred Vendor Website (as well as any additional policies VF may send to them from time to time during the contract - Master Manufacturing Terms and Conditions sections 12.5, 27.2). The Preferred Vendor Website includes the full Terms of Engagement, Code of Business Conduct, our Restrict Substances List, and other vital documents (Master Manufacturing Terms and Conditions section 28.1)'.</p> <p>In the same document, it also discloses 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'.</p> <p>The Company provides an example of risk faced on two specific location on its website, human rights in our supply chain section, but it does not indicate how on a general basis geographical, economic and other social factors are taken into account: 'Our supply chain often extends into countries such as Bangladesh and Cambodia that have minimal government regulation and enforcement around human rights. Issues that can arise may include unsafe working conditions, no worker unionization, child and forced labor, human trafficking and minimal wages'.</p>	Submission to the CHRB Disclosure Platform: 'CHRB Response Spreadsheet' Company website: 'Human rights in our supply chain'
B.2 HUMAN RIGHTS DUE DILIGENCE	Integrating and Acting: Integrating assessment findings internally and taking appropriate action	<p>2 In its CHRB submission the Company states 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.</p> <p>Also in this document, the Company provides 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 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'.</p>	Submissions to the CHRB Disclosure Platform: 'CHRB Response Spreadsheet' and 'Responses to CHRB Assessment and Questions'
B.2 HUMAN RIGHTS DUE DILIGENCE	Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts	<p>1 The Company indicates in the CHRB submission 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 its response to CHRB assessment, the Company indicates that since 2015 all its owned factories have had these audits as well.</p> <p>The Company also discloses in the CHRB submission the example mentioned above regarding lessons learned following factory audits and improvement action. However, it does not disclose an example of lessons learned while tracking the effectiveness of its actions.</p>	Submissions to the CHRB Disclosure Platform: 'CHRB Response Spreadsheet' and 'Responses to CHRB Assessment and Questions'
B.2 HUMAN RIGHTS DUE DILIGENCE	Communicating: Accounting for how human rights impacts are addressed	<p>1 The Company indicates in the CHRB submission 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'.</p> <p>In the response to CHRB Assessment, the Company describes how it communicates directly with workers in the supply chain: 'In the past, we used to have detailed posters in all factories with contact information including phone numbers, hotline and email details for filing complaints for easy access to all workers. However, ensuring these posters were removed when we exited factories for various reasons was difficult without people on the ground, and we were starting to be held accountable for incidents that occurred well after we had stopped contracting/working with the factory. So now our auditors have conversations with workers on a regular basis and hand out business cards with detailed contact information'.</p>	Submissions to the CHRB Disclosure Platform: 'CHRB Response Spreadsheet' and 'Responses to CHRB Assessment and Questions'

C. REMEDIES AND GRIEVANCE MECHANISMS	C.1	Grievance channels/mechanisms to receive complaints or concerns from workers	<p>1 The Company indicates in the CHRB submission that: 'As stated in VF's Code of Conduct, Open Door Policy and Non-Retaliation Policy, VF encourages all employees to raise concerns about potential violations of our Code of Conduct or the law, including potential human rights violations. Employees are provided multiple reporting options such as their manager, another trusted manager, Human Resources, VF Ethics and Compliance and the Ethics Helpline. The Ethics Helpline is free, confidential and available 24 hours a day, seven days a week to anyone who wishes to raise a concern. Where allowed by law, reports may be made anonymously'. It also indicates that: 'VF also provides mobile services in specific countries (e.g. Bangladesh) through which workers can call a local hotline number and report a complaint. The Bangladesh worker hotline number is : +880 9666771166'. In the same document the Company also describes how it ensures that the channel is accessible to all workers: 'In 2013, VF learned through a survey that potential users in certain countries were unable to access its free, confidential Ethics Helpline via phone. VF subsequently undertook a global redesign project to ensure access to all VF associates, suppliers and third parties in every country where VF does business. As a result of additional feedback, VF increased the number of languages available to users to over 150'.</p> <p>In addition, in this CHRB submission the Company states that 'in 2014, reports increased by 48% over 2013, and in 2015, VF experienced a 118% increase primarily due to enhanced awareness of reporting channels. In response, VF provided additional training to investigators and increased the number of employees with direct responsibility for managing reports'. The Company, however, does not disclose the number of grievances about human rights filed, addressed and resolved in its own manufacturing operations. It also doesn't disclose documents describing an evaluation of the effectiveness of the mechanisms in place.</p> <p>Also, the Company also indicates in the CHRB submission that: 'All worker communities, including Tier 2 and Tier 3 workers, have access to VF's Ethics Helpline, and suppliers are also encouraged to establish their own reporting mechanisms. Supplier workers have, indeed, taken advantage of VF's reporting mechanisms, including the Ethics Helpline, to raise concerns in the</p>	Submission to the CHRB Disclosure Platform: 'CHRB Response Spreadsheet'
C. REMEDIES AND GRIEVANCE MECHANISMS	C.2	Grievance channels/mechanisms to receive complaints or concerns from external individuals and communities	<p>1 The Company states in the CHRB submission that: 'VF provides multiple channels for employees, worker communities and others to raise complaints or concerns about violations of the Company's Code of Conduct or the law, including human rights issues. These multiple mechanisms are managed and tracked in a case management system through partnership with a third-party service provider to ensure consistency and, where requested, anonymity. All worker communities, including Tier 2 and Tier 3 workers, have access to VF's Ethics Helpline, and suppliers are also encouraged to establish their own reporting mechanisms. Supplier workers have, indeed, taken advantage of VF's reporting mechanisms, including the Ethics Helpline, to raise concerns in the past. In 2015, VF tracked two third-party worker human rights complaints via its case management system. Those reports were thoroughly investigated according to VF's investigation protocol and included discussions with the factory and the reporter. While both cases were unsubstantiated, VF encouraged the continuation of open dialogue to resolve the issues'.</p> <p>In addition, in the same document it also indicates that 'VF learned through a survey that potential users in certain countries were unable to access its free, confidential Ethics Helpline via phone. VF subsequently undertook a global redesign project to ensure access to all VF associates, suppliers and third parties in every country where VF does business. As a result of additional feedback, VF increased the number of languages available to users to over 150'. However, although in this submission the Company says that its suppliers are encouraged to establish its reporting mechanisms, it is not indicated whether they convey the same expectation to their suppliers, or whether communities and individuals affected by suppliers' operations have access to the Company's channels/mechanisms.</p>	Submission to the CHRB Disclosure Platform: 'CHRB Response Spreadsheet'
C. REMEDIES AND GRIEVANCE MECHANISMS	C.3	Users are involved in the design and performance of the channel(s)/mechanism(s)	<p>1 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. As an example, in 2013, VF learned through a survey that potential users in certain countries were unable to access its free, confidential Ethics Helpline via phone. VF subsequently undertook a global redesign project to ensure access to all VF associates, suppliers and third parties in every country where VF does business. As a result of additional feedback, VF increased the number of languages available to users to over 150. 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'. However, 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.</p>	Submission to the CHRB Disclosure Platform: 'CHRB Response Spreadsheet'
C. REMEDIES AND GRIEVANCE MECHANISMS	C.4	Procedures related to the mechanism(s) / channel(s) are publicly available and explained	<p>1 The Company states in the CHRB submission that: 'VF has a robust process for tracking and handling reported concerns. Reports of potential ethics or human rights violations received by VF's corporate offices are tracked in VF's case management system, regardless of the reporting mechanism. Each report is assigned to an investigator and handled according to VF's investigation protocol. When contact information is provided, reporters receive acknowledgement within 48 hours. Issues are triggered and categorized and an escalation matrix is provided to each investigator to ensure issues are raised with senior management as appropriate. Over 150 system administrators and investigators have received formal training on investigating and tracking concerns. External investigators are often engaged to ensure an objective and unbiased approach is applied. Stakeholders receive communications in their stated preferred language, including a close-out message at the end of each investigation. Reports are provided to VF's senior management and external auditing firm on a regular basis. 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'.</p>	Submission to the CHRB Disclosure Platform: 'CHRB Response Spreadsheet'

C. REMEDIES AND GRIEVANCE MECHANISMS	C.5	Commitment to non-retaliation over concerns/complaints made	2 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. 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. VF has not brought a retaliatory suit or fired an employee for raising a human rights violation concern. 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'. VF's Global Compliance Principles also contain provisions prohibiting suppliers from taking retaliatory action against workers'. Finally, the Company's non-retaliation policy also indicates that 'Reports may be made anonymously if an associate does not want to be identified.	Submissions to the CHRB Disclosure Platform: 'CHRB Response Spreadsheet' and 'Responses to CHRB Assessment and Questions'
C. REMEDIES AND GRIEVANCE MECHANISMS	C.6	Company involvement with State-based judicial and non-judicial grievance mechanisms	0 Regarding this indicator, the Company's CHRB submission states: 'Principle 1 in our Global Compliance Principles 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 and footwear industry. Employers must be ethical in their business practices"'. However, it does not disclose information material to the indicator.	Submission to the CHRB Disclosure Platform: 'CHRB Response Spreadsheet'
C. REMEDIES AND GRIEVANCE MECHANISMS	C.7	Remedying adverse impacts and incorporating lessons learned	1 The Company describes the approach that follows to address matters of concern and explains a few cases involving key industry risks in the CHRB submission: 'There are opportunities during the year for VF to engage with NGOs, labor, governments and not-for-profit groups to address matters of concern. We take each and every opportunity seriously and respond to all. There are times when we can quickly align on matters of concern, there are times when remediation or resolving an item takes time, and there are times when an agreement is not reached regarding the extent of a matter and how to best act. Communications are received by VF's Internal Audit organization, the Responsible Sourcing team, the Supply Chain group or the Public Affairs team. 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. The two former issues have been successfully resolved and the Swaziland matter is in process -- to be completed by year's end. 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'. The Company, however, does not describe changes to systems or new processes/practices adopted which are designed to prevent similar adverse impacts in the future.	Submission to the CHRB Disclosure Platform: 'CHRB Response Spreadsheet'
D. ENABLING FACTORS AND BUSINESS PROCESSES	D.2.1.a	Living wage (in own production or manufacturing operations)	0 The Global Compliance Principles state that: '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 clear, written accounting for each pay period'. 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). On its website, 'supplier partnerships' section, the Company indicates that it has a partnership with Social Accountability International (SAI): 'Our work with SAI includes a research project to help us assess whether the wages we pay within our company-owned manufacturing facilities are aligned with basic needs. This entails field validation, associate interviews and stakeholder engagement, all of which will enable us to consider different basic needs, such as food, clean	Global Compliance Principles Company website: 'Supplier partnership' Submissions to the CHRB Disclosure Platform: 'CHRB Response Spreadsheet' and 'Responses to CHRB Assessment and Questions'

D. ENABLING FACTORS AND BUSINESS PROCESSES	D.2.1.b	Living wage (in the supply chain)	<p>0 The Company refers in the CHRB submission to the Global Compliance Principles: 'As stated in Principle 4 of VF's Global Compliance Principles, VF recognizes that compensation packages vary by country. 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 clear, written accounting for each pay period'.</p> <p>Also, following the information provided by the Group to the indicator concerning the Company's own operations, in the document 'responsible sourcing' available on the BHRRCC website, the Company states: 'VF believes every person should have access to clean water, nutritional food, adequate housing, affordable healthcare, and opportunities for education. We are committed to helping improve the lives of workers' and their families where their ability to secure these basic needs may be challenged. Supplier factories may be located in regions of the world where these items and services are not always accessible. Through Responsible Sourcing, we conduct ongoing assessments to confirm that workers' needs are met. Should gap exist, VF works in collaboration with the supplier and appropriate local organizations to determine how improvements can be made'. It also indicates in this document that it has two programmes in place: 'HERhealth helps to improve the health-related knowledge and behaviors, and access to health services and products, for low-income working women in garment, footwear, house ware, agricultural and horticulture sectors'. Herfinance builds the financial capability of low income employees in global supply chains by delivering workplace-based financial education programs and connecting factory employees to appropriate financial services'.</p> <p>However, it does not indicate whether there are guidelines for suppliers on 'living wage' including regular review and negotiation through collective bargaining agreements, nor describes how it works with suppliers to improve their living wage practices.</p>	Submissions to the CHRB Disclosure Platform: 'CHRB Response Spreadsheet' and 'Responsible Sourcing Overview'
D. ENABLING FACTORS AND BUSINESS PROCESSES	D.2.2	Aligning purchasing decisions with human rights	<p>0 The Company indicates in the CHRB submission that 'Purchasing policies and practices are informed by the VF Vendor Scorecard, such that VF does not place orders at factories with poor performance. VF will decrease order quantity (when possible) from existing vendors if performance gaps are identified. However, it does not disclose positive incentives to business relationships to act with respect for human rights, nor describes whether it adopts practices to avoid price or short notice requirements or other considerations undermining human rights.</p>	Submission to the CHRB Disclosure Platform: 'CHRB Response Spreadsheet'
D. ENABLING FACTORS AND BUSINESS PROCESSES	D.2.3	Mapping and disclosing the supply chain	<p>1 The Company indicates in the CHRB submission 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'.</p> <p>It does not disclose its supply chain: 'We do not currently publish our vendor list, but track performance on an on-going basis (summarized in monthly reports) for all VF factories'.</p>	Submission to the CHRB Disclosure Platform: 'CHRB Response Spreadsheet'
D. ENABLING FACTORS AND BUSINESS PROCESSES	D.2.4.a	Age verification and corrective actions (in own production or manufacturing operations)	<p>0 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 14 where consistent with International Labor Organization guidelines) or younger than the age for completing compulsory education in the country of manufacture where such age is higher than 15. All 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. Because these expectations are part of our Terms of engagement, they are subject to verification as part of our standard auditing procedures'.</p> <p>However, although it is part of the auditing process, the Company does not clarify whether it verifies also the age of job applicants in its own operations.</p> <p>It also indicates in the submission that: 'Our supply chain often extends into countries that have minimal government regulation and enforcement around human rights. Issues that can arise may include unsafe working conditions, no worker unionization, child and forced labor, human trafficking and minimal wages. 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'. However, it does not disclose information on how it develops, participates or contributes to programmes for transition for employment to education and to improve working conditions for young workers</p>	Submission to the CHRB Disclosure Platform: 'CHRB Response Spreadsheet'

D. ENABLING FACTORS AND BUSINESS PROCESSES	D.2.4.b	Age verification and corrective actions (in the supply chain)	<p>1 In the CHRB submission the Company states: '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 14 where consistent with International Labor Organization guidelines) or younger than the age for completing compulsory education in the country of manufacture where such age is higher than 15. All 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 a response to this indicator, the CHRB submission also indicates that: 'Our supply chain often extends into countries that have minimal government regulation and enforcement around human rights. Issues that can arise may include unsafe working conditions, no worker unionization, child and forced labor, human trafficking and minimal wages. 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'. However, it does not indicate whether it includes guidelines for suppliers to verify the age of job applicants and remediation programmes. Global compliance principles set forth the basic requirements all factories must meet in order to do business with VF'</p> <p>In addition, the Company indicates on its website, supplier training section, the following: 'Approximately 2.5% of factories failed for issues related to juvenile labor. Sample action plans for factories found noncompliant with Global Compliance Principle 2 included: Arranging health checks for juvenile workers as following: a) before the juvenile worker begins working at the enterprise; b) after the juvenile worker has worked for one full year; c) when the juvenile worker has reached 18 years of age and has not had health examination in the previous six months. 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'. This</p>	Submission to the CHRB Disclosure Platform: 'CHRB Response Spreadsheet' Company website: 'Supplier training' Global Compliance principles
D. ENABLING FACTORS AND BUSINESS PROCESSES	D.2.5.a	Debt bondage and other unacceptable financial costs (in own production or manufacturing operations)	<p>0 The Company indicates in the CHRB submission that: 'Included in our audit scope under P3-1C: Determine that the facility does not utilize involuntary, forced, indentured, or prison labor. If a factory utilizes migrant workers, agent fees should be deemed as reasonable and should not exceed one month's salary or the local legal requirement'. It does not disclose information on whether it pays workers regularly, in full and on time, nor indicates whether workers receive a payslip explaining their wages. Finally, the Company does not clarify whether agent fees are paid by workers or by the Company.</p>	Submission to the CHRB Disclosure Platform: 'CHRB Response Spreadsheet'
D. ENABLING FACTORS AND BUSINESS PROCESSES	D.2.5.b	Debt bondage and other unacceptable financial costs (in the supply chain)	<p>0 The Company indicates in the CHRB submission that: 'Included in our audit scope under P3-1C: Determine that the facility does not utilize involuntary, forced, indentured, or prison labor. If a factory utilizes migrant workers, agent fees should be deemed as reasonable and should not exceed one month's salary or the local legal requirement'. However, it does not disclose information on whether it includes debt bondage guidelines in contractual agreements (or suppliers' code), and whether these practices are taken into account positively in the identification and selection of suppliers. The Company also does disclose documents indicating if it works with suppliers to eliminate imposing financial burdens on workers.</p>	Submission to the CHRB Disclosure Platform: 'CHRB Response Spreadsheet'
D. ENABLING FACTORS AND BUSINESS PROCESSES	D.2.5.c	Restrictions on workers (in own production or manufacturing operations)	<p>0 The Company indicates in the CHRB submission that: 'Included in our audit scope under P3-1C: Determine that the facility does not utilize involuntary, forced, indentured, or prison labor. All workers should be free to move about the factory (except for the protection of facility property or security) or to leave the factory at will. If passports are maintained by the factory, they must be accessible to the workers within 24 hours of request'. It however, does not indicate whether it pays for accommodation.</p> <p>The Company does not disclose documents indicating whether it implements and checks restrictions on its workers with employment agencies, labour brokers or recruitment intermediaries.</p>	Submission to the CHRB Disclosure Platform: 'CHRB Response Spreadsheet'
D. ENABLING FACTORS AND BUSINESS PROCESSES	D.2.5.d	Restrictions on workers (in the supply chain)	<p>1 The Company states in the CHRB submission that: 'Included in our audit scope under P3-1C: Determine that the facility does not utilize involuntary, forced, indentured, or prison labor. All workers should be free to move about the factory (except for the protection of facility property or security) or to leave the factory at will. If passports are maintained by the factory, they must be accessible to the workers within 24 hours of request'. However, it does not disclose information indicating whether it includes guidelines ensuring its suppliers refrain from restricting workers' freedom of movement in its contractual agreements (or code of conduct). It also does not indicate if it takes these practices into account positively in supplier identification and selection.</p> <p>The Company indicates on its website, supplier training section, the following: 'Approximately 3% of factories failed for issues related to forced labor. Sample action plans for factories found noncompliant with Global Compliance Principle 3 included: Refraining from retaining worker passports, bankbooks or any personal identification documents; returning the passport and stamp for bankbook to all migrant workers; and absorbing a secure methodology or providing a personal locker at safe place for each migrant worker with a key to safeguard their personal belongings. Ensuring a day of rest is observed and that overtime beyond normal schedules is arranged on a voluntary basis'. This information refers to audits conducted in 2013 and its the most recent information available on the website.</p>	Submission to the CHRB Disclosure Platform: 'CHRB Response Spreadsheet' Company website: 'Supplier training'

D. ENABLING FACTORS AND BUSINESS PROCESSES	D.2.6.a	Freedom of association and collective bargaining (in own production or manufacturing operations)	<p>1 The Company indicates in the CHRB submission that: 'All VF operations and suppliers are subject to our Global Compliance Principles. As stated in Principle 6, 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'.</p> <p>Regarding workforce covered by collective bargaining agreements, the Annual report 2015 indicates that 'VF had approximately 64,000 employees at the end of 2015, of which approximately 28,000 were located in the U.S. Approximately 600 employees in the U.S. are covered by collective bargaining agreements. In international markets, a significant percentage of employees are covered by trade-sponsored or governmental bargaining arrangements. Employee relations are considered to be good'. However, it does not disclose the percentage of its total workforce that is covered by collective bargaining agreements nor whether it has put in place measures to prohibit intimidation or retaliation to exercise these rights against its own employees in manufacturing activities</p>	Submission to the CHRB Disclosure Platform: 'CHRB Response Spreadsheet' Annual report 2015
D. ENABLING FACTORS AND BUSINESS PROCESSES	D.2.6.b	Freedom of association and collective bargaining (in the supply chain)	<p>1 The Company indicates in the CHRB submission that: 'All VF operations and suppliers are subject to our Global Compliance Principles. As stated in Principle 6, 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. 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'. Compliance with these principles are required for factories in order to do business with VF.</p> <p>The Company indicates on its website, supplier training section, that 'approximately 1 percent of factories failed for issues related to freedom of association and collective bargaining. Sample action plans for factories found noncompliant with Global Compliance Principle 6 included: Establishing an employee representative as required by law. Assisting the worker welfare committee to conduct quarterly meetings regularly with a record of such meetings maintained. Providing a suggestion box for the employees to raise any concern they may have'. This information refers to audits conducted in 2013 and its the most recent information available on the website.</p>	Submission to the CHRB Disclosure Platform: 'CHRB Response Spreadsheet' Company website: 'Supplier training' Global Compliance principles
D. ENABLING FACTORS AND BUSINESS PROCESSES	D.2.7.a	Fatalities, lost days, injury rates (in own production or manufacturing operations)	<p>0 The Company reports in the CHRB submission that: 'Total accidents across our owned manufacturing facilities by region in 2015: Total: 1,011 accidents; 278 North America; 562 Central and South America; 171 EMEA; 0 Asia'. 'Total days lost across our owned manufacturing facilities by region in 2015: Total Days Lost: 7,693; 2,765 North America; 4,453 Central and South America; 475 EMEA; 0 Asia'. The Company, however, does not disclose figures on fatalities nor injury rate (although it discloses accidents'.</p> <p>On its website, owned manufacturing section, the Company describes the systems in place for its own manufacturing operations, called Ideal Plant Model, which 'is a comprehensive set of guidelines and expectations designed to provide safe, clean and comfortable working environments for our associates' (employees). In the CHRB submission it also describes the system: 'We communicate the results in town hall meetings to the employees and the plant safety committee (which is made up of all levels of associates) works on any outstanding issues. We also report to OSHA any injuries or incidents at the plant and we communicate them to the employees through the employee bulletin board and in our monthly safety meetings'. However, it does not disclose specific targets, nor explains the figures provided.</p>	Submission to the CHRB Disclosure Platform: 'CHRB Response Spreadsheet' Company website: 'Owned manufacturing'
D. ENABLING FACTORS AND BUSINESS PROCESSES	D.2.7.b	Fatalities, lost days, injury rates (in the supply chain)	<p>0 The Company's submission to CHRB on this topic refers to owned operation and not to suppliers. It has not disclosed quantitative information on health and safety regarding suppliers. On its website, contract suppliers section that 'before we begin engaging with a contract supplier, every facility must be audited to ensure it meets our high safety and health standards encompassed in our Global Compliance Program'. However, it does disclose documents indicating whether these practices are taken into account positively in the identification and selection of suppliers.</p> <p>The Company also indicates in this section that 'by applying our comprehensive compliance framework to all of our contract suppliers, we have an opportunity to improve the health and safety of workers and implement best practices from our owned manufacturing facilities'.</p> <p>On the website, Human Rights in our Supply Chain section, the Company describes the details on actions that it has taken as an individual company and together with the Alliance for Bangladesh Workers safety. Some of the actions reported on the website include the following: 'VF is investing at least \$17 million overall to ensure health and safety of Bangladesh workers through factory improvements, guaranteeing of qualified supplier loans and financial support for directly impacted workers'; 'VF is partnering with the International Finance Corporation to provide \$10 million in below market loans to factory owners to help cover the cost of needed improvements fund during third party inspections'; 'We helped develop and implement a common fire and building safety standard to be applied to all Bangladesh factories'.</p>	Submission to the CHRB Disclosure Platform: 'CHRB Response Spreadsheet' Company website: 'Human rights in our supply chain'

D. ENABLING FACTORS AND BUSINESS PROCESSES	D.2.8.a	Women's rights (in own production or manufacturing operations)	1 In the CHRB submission the Company indicates that: 'All VF associates and suppliers are subject to our Global Compliance Principles. As stated in Principle 10, 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. 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. The VF Compliance team audits for evidence of discrimination, including ensuring workers receive equal pay for the same job, regardless of gender'. The Company's policy, therefore describes how it takes into account differential impacts on women and men of working conditions, including to reproductive health. However, the Company does not describe how equality of opportunity is monitored and maintained throughout all levels of employment, nor its processes to prohibit harassment and violence against women.	Submission to the CHRB Disclosure Platform: 'CHRB Response Spreadsheet'
D. ENABLING FACTORS AND BUSINESS PROCESSES	D.2.8.b	Women's rights (in the supply chain)	0 In the CHRB submission the Company indicates that: 'All VF associates and suppliers are subject to our Global Compliance Principles. As stated in Principle 10, 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. 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. The VF Compliance team audits for evidence of discrimination, including ensuring workers receive equal pay for the same job, regardless of gender'. However, the Company does not indicate how these practices are taken into account positively in the identification and selection of suppliers. It also does not indicate whether it works with suppliers to improve their practices in relation to women's rights.	Submission to the CHRB Disclosure Platform: 'CHRB Response Spreadsheet'
D. ENABLING FACTORS AND BUSINESS PROCESSES	D.2.9.a	Working hours (in own production or manufacturing operations)	0 The fifth principle of the Global Compliance Principles states that: '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 or (b) 60 hours per week including overtime (except in extraordinary business circumstances). Employees must be informed at the time of hiring if mandatory overtime is a condition of employment. All employees will be entitled to at least one day off in every seven-day period'. The Company, however, does not disclose documents indicating how it implements and checks this practice in its operations. Also, the principle requires not to exceed requirements 'on a regularly scheduled basis' and it is possible that mandatory overtime is included in contracts.	Global Compliance principles
D. ENABLING FACTORS AND BUSINESS PROCESSES	D.2.9.b	Working hours (in the supply chain)	0 The fifth principle of the Global Compliance Principles states that: '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 or (b) 60 hours per week including overtime (except in extraordinary business circumstances). Employees must be informed at the time of hiring if mandatory overtime is a condition of employment. All employees will be entitled to at least one day off in every seven-day period'. The Company, however, does not describe how these practices are taken into account positively in the identification and selection of suppliers. Also, the principle requires not to exceed requirements 'on a regularly scheduled basis' and it is possible that mandatory overtime is included in contracts. Finally, it also does not disclose documents describing how it works with suppliers to improve their practices in relation to working hours	Global Compliance Principles
E. PERFORMANCE: RESPONSES TO SERIOUS ALLEGATIONS	E.0	Summary of allegation	Area of allegation: Child labour in the supply chain Headline: A CBS news report made allegations of child labour at the Monde Apparels factory in Bangladesh Date: May 2013 Summary: In May 2013, a CBS news report made allegations of child labour at the Monde Apparels factory in Bangladesh. According to the report, Monde Apparels produced clothing for the Company's brand Wrangler. CBS reporters spoke to a woman and her daughter who asked the reporters to hide their identities through fear of being fired for speaking out. The daughter claimed to be 12 years old and one of many children working at the factory; she explained how she had given the factory a fake birth certificate showing her age as 18. The manager of the factory had told reporters that his company does not allow child labour and that it cannot employ people until they turn 18. Following the CBS report, it was alleged that at least nine girls around the age of 12 were fired from Monde Apparels. The Institute for Global Labour and Human Rights followed up with the girls, provided financial assistance and ensured that at least one returned to school. The mother of the girl interviewed explained how the factory managers discovered her identity and bullied her until she quit working at Monde Apparels.	CBS News, 22/05/2013 - <a href="http://www.cbsnews.com/news/cbs-news-goes-undercover-in-a-bangladesh-clothing-factory/">http://www.cbsnews.com/news/cbs-news-goes-undercover-in-a-bangladesh-clothing-factory/</a> CBS News, 27/06/2013 - <a href="http://www.cbsnews.com/news/despite-promises-bangladesh-factory-still-unsafe-for-workers/">http://www.cbsnews.com/news/despite-promises-bangladesh-factory-still-unsafe-for-workers/</a> Institute for Global Labour and Human Rights, 27/06/2013 - <a href="http://www.globallabourrights.org/press/despite-promises-bangladesh-factory-still-unsafe-for-workers">http://www.globallabourrights.org/press/despite-promises-bangladesh-factory-still-unsafe-for-workers</a>
E. PERFORMANCE: RESPONSES TO SERIOUS ALLEGATIONS	E.1	The Company has responded publicly to the allegations	0 As far as CHRB was able to ascertain, the Company has not responded publicly to the allegations.  The Company's brand, Wrangler, advised CBS News that Monde Apparels had been approved for production by an independent labour group. It advised CBS News that it sent an inspector to the factory and has since stopped production at Monde Apparels.	CBS News, 22/05/2013 - <a href="http://www.cbsnews.com/news/cbs-news-goes-undercover-in-a-bangladesh-clothing-factory/">http://www.cbsnews.com/news/cbs-news-goes-undercover-in-a-bangladesh-clothing-factory/</a> CBS News, 27/06/2013 - <a href="http://www.cbsnews.com/news/despite-promises-bangladesh-factory-still-unsafe-for-workers/">http://www.cbsnews.com/news/despite-promises-bangladesh-factory-still-unsafe-for-workers/</a> Company website

E. PERFORMANCE: RESPONSES TO SERIOUS ALLEGATIONS	E.2	The Company has appropriate policies in place	2 The Company has a supply chain labour standards policy which covers the issue of child labour. The Company states 'no person shall be employed at an age younger than 15 (or 14 where consistent with International Labor Organization guidelines) or younger than the age for completing compulsory education in the country of manufacture where such age is higher than 15. All 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'.	Company website
E. PERFORMANCE: RESPONSES TO SERIOUS ALLEGATIONS	E.3	The Company has taken appropriate action to address the alleged impacts	0 The Company has joined relevant initiatives dealing with supply chain labour standards in its sector – the Fair Labor Association and Social Accountability International. The Company has a monitoring and auditing system in place for assessing its suppliers. However, the Company has not indicated it has entered in to a dialogue with affected stakeholders.	CBS News, 22/05/2013 - <a href="http://www.cbsnews.com/news/cbs-news-goes-undercover-in-a-bangladesh-clothing-factory/">http://www.cbsnews.com/news/cbs-news-goes-undercover-in-a-bangladesh-clothing-factory/</a> CBS News, 27/06/2013 - <a href="http://www.cbsnews.com/news/despite-promises-bangladesh-factory-still-unsafe-for-workers/">http://www.cbsnews.com/news/despite-promises-bangladesh-factory-still-unsafe-for-workers/</a> Company website IGLHR, 03/10/2013 <a href="http://www.wsj.com/articles/SB10001424052702304795804579101003566148372">http://www.wsj.com/articles/SB10001424052702304795804579101003566148372</a>
E. PERFORMANCE: RESPONSES TO SERIOUS ALLEGATIONS	E.0	Summary of allegation	Area of allegation: Discrimination in the supply chain and Excessive hours in the supply chain Headline: Discrimination against pregnant women at the Next Collections Limited factory in Ashulia, Bangladesh. Date: Oct 2013 Summary: In October 2013 the Wall Street Journal published allegations that pregnant workers at the Next Collections Limited factory in Bangladesh were discriminated against, by either being forced to resign or being denied their legal paid maternity leave. The Journal said Next Collections was a supplier to the Company. Many of the factory records were provided to the Journal by the Institute for Global Labour and Human Rights (IGLHR). In October 2013 the IGLHR published a report entitled 'Gap and Old Navy in Bangladesh' which alleged that women at the Next Collections factory were routinely denied their legal paid maternity leave. The report claimed that once a woman is six months pregnant, the factory's management begins to 'harass and bully her to get out.' The women are fired, or forced to resign, without receiving their maternity benefits, their paid annual leave they have earned, their severance pay and sick leave. CHRB Note: the IGLHR report did not name the Company specifically but the allegations of general labour conditions at the factory are deemed to be relevant because the Company was identified by the Wall Street Journal as placing orders there.	Wall Street Journal, 04/10/2013 - <a href="https://www.wsj.com/articles/SB10001424052702304795804579101003566148372">https://www.wsj.com/articles/SB10001424052702304795804579101003566148372</a>
E. PERFORMANCE: RESPONSES TO SERIOUS ALLEGATIONS	E.1	The Company has responded publicly to the allegations	2 The Company has responded specifically and in detail to the allegations.  In response to the allegations reported by the Wall Street Journal the Company said it had decided to stop placing orders with Next Collections after finding repeated violations of its standards on wages and hours worked. A compliance officer from the Company had found some violations during an audit in January 2013. A review in March 2013 showed some progress but then another check on 23 September 2013 found that the problems had returned. 'Based on our audits of Next Collections and the unwillingness of the factor's management to fully partner with us to meet and sustain compliance with our standards, we are planning to exit the facility,' said a spokeswoman for the Company. The Company said it would continue to place orders with other Ha-Meem Group factories.	Wall Street Journal, 04/10/2013 - <a href="https://www.wsj.com/articles/SB10001424052702304795804579101003566148372">https://www.wsj.com/articles/SB10001424052702304795804579101003566148372</a>
E. PERFORMANCE: RESPONSES TO SERIOUS ALLEGATIONS	E.2	The Company has appropriate policies in place	1 The Company has a supply chain policy on non-discrimination on the basis of pregnancy and gender.  The Company has published its Global Compliance Principles on the website, with which suppliers must comply. These include a policy on women's rights: '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. 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 employment at the same rate of pay and benefits.' The Principles also include a general statement of non-discrimination on the basis of gender.  Hence, the Company has a partial supply chain policy on working hours. In order to score 2, the Company would have to publish a supply chain policy working hours which limits the regular working week to 48 hours and specifically prohibits forced overtime.	Company website
E. PERFORMANCE: RESPONSES TO SERIOUS ALLEGATIONS	E.3	The Company has taken appropriate action to address the alleged impacts	0 The Company has joined relevant initiatives dealing with supply chain labour standards in its sector – the Fair Labor Association and Social Accountability International. The Company has a monitoring and auditing system in place for assessing its suppliers. The Company states that no production can be performed in a facility until a factory inspection has taken place and once in production, the Company undertakes announced and unannounced internal audits. Should a factory fail to implement corrective actions following an audit, it may cease to be used by the Company.  However, the Company has not indicated it has entered in to a dialogue with affected stakeholders.	Wall Street Journal, 04/10/2013 - <a href="https://www.wsj.com/articles/SB10001424052702304795804579101003566148372">https://www.wsj.com/articles/SB10001424052702304795804579101003566148372</a> Company website
E. PERFORMANCE: RESPONSES TO SERIOUS ALLEGATIONS	E.0	Summary of allegation	Area of allegation: Trade union rights in the supply chain Headline: Illegal firings or forced resignation at Petralex, Honduras Date: Nov 2014, March 2015 Summary: The Fair Labor Association (FLA) has alleged that between November 2014 and March 2015, the Petralex factory in Villanueva, Honduras, illegally fired or forced the resignations of at least 19 garment workers. They included nine SitraPetralex union leaders and 10 union affiliates or relatives of union leaders, according to an independent investigation by the FLA in April 2015. Petralex manufactures garments the Company and other retailers.	FLA report, 11/04/2015 - <a href="http://www.fairlabor.org/sites/default/files/documents/reports/petralex_independent_investigation_final_report_april_2015.pdf">http://www.fairlabor.org/sites/default/files/documents/reports/petralex_independent_investigation_final_report_april_2015.pdf</a> FLA press release, 24/04/2015 - <a href="http://www.fairlabor.org/report/freedom-association-violations-petralex-honduras">http://www.fairlabor.org/report/freedom-association-violations-petralex-honduras</a>
E. PERFORMANCE: RESPONSES TO SERIOUS ALLEGATIONS	E.1	The Company has responded publicly to the allegations	0 As far as CHRB has been able to ascertain, the Company has not responded publicly to these allegations. However, the FLA reported that its affiliated companies sourcing from Petralex agreed to waive their own assessment of the allegations and allow the FLA to investigate.	FLA report, 13/07/2015 - <a href="http://www.fairlabor.org/sites/default/files/documents/reports/petralex_final_report_july_2015.pdf">http://www.fairlabor.org/sites/default/files/documents/reports/petralex_final_report_july_2015.pdf</a> Company website

E. PERFORMANCE: RESPONSES TO SERIOUS ALLEGATIONS	E.2	The Company has appropriate policies in place	2 The Company has a supplier code of conduct which covers both collective bargaining and freedom of association.  The Company has published its Global Compliance Principles for suppliers on the corporate website which include: '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.' The Company requires inspection of a facility before any production of its branded or licensed products may take place and a copy of the policy has been signed by the supplier. The Company may terminate its relationship with a supplier if basic requirements cannot be met through corrective action following a compliance audit.	FLA report, 13/07/2015 - <a href="http://www.fairlabor.org/sites/default/files/documents/reports/petralex_final_report_july_2015.pdf">http://www.fairlabor.org/sites/default/files/documents/reports/petralex_final_report_july_2015.pdf</a> Company website
E. PERFORMANCE: RESPONSES TO SERIOUS ALLEGATIONS	E.3	The Company has taken appropriate action to address the alleged impacts	1 The Company has joined relevant initiatives dealing with supply chain labour standards in its sector – the Fair Labor Association and Social Accountability International. The organisation which made the accusation has confirmed that it is satisfied each alleged breach has been remedied. However, the Company has not indicated it has entered in to a dialogue with affected stakeholders.  NOTE: Given that the organisation which made the accusation has confirmed that it is satisfied each alleged breach has been remedied, the Company gets score 1.	FLA report, 13/07/2015 - <a href="http://www.fairlabor.org/sites/default/files/documents/reports/petralex_final_report_july_2015.pdf">http://www.fairlabor.org/sites/default/files/documents/reports/petralex_final_report_july_2015.pdf</a> Company website
F. TRANSPARENCY	F.A.2.1	Commitment from the Top	1 See related indicator.	
F. TRANSPARENCY	F.A.2.2	Board discussions	1 The Company's sustainability section of the website indicates that 'in 2014 we formed the Sustainability & Responsibility Team (SRLT) to further guide the applications of sustainability and responsibility throughout the company. The group, which meets quarterly, is comprised of brand leaders and senior leaders from human resources, supply chain, legal, corporate, investor relations and our brands. The SRLT is tasked with approving the scope, strategic plans, goals and policies for VF's sustainability and responsibility program. It also addresses the environmental and social issues that present the greatest risks and opportunities for VF, including topics such as living wage, animal-derived materials, forest-derived material and human rights in the supply chain'	Company website: 'Sustainability governance'
F. TRANSPARENCY	F.A.2.3	Incentives and performance management	0 CHRB has not identified disclosures highlighted in a company GRI Index or otherwise referenced by this indicator that meet the requirements.	
F. TRANSPARENCY	F.B.1.1	Responsibility and resources for day-to-day human rights functions	1 The Company indicates in the sustainability governance section on its website that 'in 2010, VF formed a sustainability council to coordinate sustainability and responsibility strategy development and implementation. The council oversees greenhouse gas reduction projects and goal setting, and it includes working groups focusing on community, innovation, communications and issues management. The council meets twice a year and comprises global sustainability leaders and subject matter experts across brands and corporate functions, including our innovation team. As part of their daily responsibilities, these leaders work to ensure sound business perspective is infused within their brand's sustainability and responsibility strategy. Functional council leaders include members from VF's procurement, operations and retail teams. It is the duty of the council to communicate and integrate VF's sustainability and responsibility strategy into each of our brands and business functions'.	Company website: 'Sustainability governance'
F. TRANSPARENCY	F.B.1.2	Incentives and performance management	0 CHRB has not identified disclosures highlighted in a company GRI Index or otherwise referenced by this indicator that meet the requirements.	
F. TRANSPARENCY	F.B.1.4.b	Communication / dissemination of policy commitment(s) to business relationships	1 See related indicator.	
F. TRANSPARENCY	F.B.1.5	Training on human rights	0 The company discloses information on training (see related indicator), however no information was found that meets the requirements of this indicator (the company does not reference any sources for this indicator in its GRI index).	GRI index
F. TRANSPARENCY	F.B.1.6	Monitoring and corrective actions	0 See related indicator. In addition, the Company's figures make reference to year 2013.	
F. TRANSPARENCY	F.B.1.7	Engaging business relationships	0 The Company's figures make reference to year 2013.	Company website: 'Supplier training' Company website: 'VF's Auditing policy'
F. TRANSPARENCY	F.B.1.8	Framework for engagement with potentially affected stakeholders	0 CHRB has not identified disclosures highlighted in a company GRI Index or otherwise referenced by this indicator that meet the requirements.	
F. TRANSPARENCY	F.B.2.1	Identifying: Processes and triggers for identifying human rights risks and impacts	0 The Company indicates in the CHRB submission that: 'VF engages with associations and governments to ensure VF's human rights expectations are understood whenever the company is considering market entry or revisiting existing sourcing strategies. As VF moves to Africa and begins to build its supplier base there, the company is doing so with clear direction and expectations that all suppliers will be fully approved and operate in full alignment with VF expectations and policies. Recently, VF has engaged the Cambodian, Kenyan, and Ethiopian governments in human rights discussions'. However, it does not disclose the human rights issues determined and the specific input from stakeholders	Submission to the CHRB Disclosure Platform: 'CHRB Response Spreadsheet'
F. TRANSPARENCY	F.B.2.2	Assessing: Assessment of risks and impacts identified (salient risks and key industry risks)	1 See related indicator.	

F. TRANSPARENCY	F.B.2.3	Integrating and Acting: Integrating assessment findings internally and taking appropriate action	1 See related indicator.	
F. TRANSPARENCY	F.B.2.4	Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts	1 See related indicator.	
F. TRANSPARENCY	F.C.1	Grievance channels / mechanisms to receive complaints or concerns from workers	1 See related indicator.	
F. TRANSPARENCY	F.C.2	Grievance channels/mechanisms to receive complaints or concerns from external individuals and communities	1 See related indicator.	
F. TRANSPARENCY	F.C.3	Users are involved in the design and performance of the channel(s)/mechanism(s)	1 See related indicator.	
F. TRANSPARENCY	F.C.4	Procedures related to the mechanism(s) / channel(s) are publicly available and explained	1 See related indicator.	
F. TRANSPARENCY	F.C.7	Remediating adverse impacts and incorporating lessons learnt	1 See related indicator.	
F. TRANSPARENCY	F.D.2.1.a	Living wage (in own production or manufacturing operations)	0 CHRB has not identified disclosures highlighted in a company GRI Index or otherwise referenced by this indicator that meet the requirements.	
F. TRANSPARENCY	F.D.2.2	Aligning purchasing decisions with human rights	0 CHRB has not identified disclosures highlighted in a company GRI Index or otherwise referenced by this indicator that meet the requirements.	
F. TRANSPARENCY	F.D.2.4	Child labour	0 The Company indicates on its website, supplier training section, the following: 'Approximately 2.5% of factories failed for issues related to juvenile labor. Sample action plans for factories found noncompliant with Global Compliance Principle 2 included: Arranging health checks for juvenile workers as following: a) before the juvenile worker begins working at the enterprise; b) after the juvenile worker has worked for one full year; c) when the juvenile worker has reached 18 years of age and has not had health examination in the previous six months. 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'. However, this information refers to audits conducted in 2013 and the Company has not disclosed updated information.	Company website: 'Supplier training'
F. TRANSPARENCY	F.D.2.5	Forced labour	0 The Company indicates on its website, supplier training section, the following: 'Approximately 3% of factories failed for issues related to forced labor. Sample action plans for factories found noncompliant with Global Compliance Principle 3 included: Refraining from retaining worker passports, bankbooks or any personal identification documents; returning the passport and stamp for bankbook to all migrant workers; and absorbing a secure methodology or providing a personal locker at safe place for each migrant worker with a key to safeguard their personal belongings. Ensuring a day of rest is observed and that overtime beyond normal schedules is arranged on a voluntary basis'. However, this information refers to audits conducted in 2013 and the Company has not disclosed updated information.	Company website: 'Supplier training'
F. TRANSPARENCY	F.D.2.6	Freedom of association and collective bargaining	0 The Company indicates on its website, supplier training section, that 'approximately 1 percent of factories failed for issues related to freedom of association and collective bargaining. Sample action plans for factories found noncompliant with Global Compliance Principle 6 included: Establishing an employee representative as required by law. Assisting the worker welfare committee to conduct quarterly meetings regularly with a record of such meetings maintained. Providing a suggestion box for the employees to raise any concern they may have'. However, this information refers to audits conducted in 2013 and the Company has not disclosed updated information.	Company website: 'Supplier training'
F. TRANSPARENCY	F.D.2.7.a	Fatalities, lost days, injury rates (in own production or manufacturing operations)	0 See related indicator.	

Women's rights (in own production or manufacturing operations)

0 CHRB has not identified disclosures highlighted in a company GRI Index or otherwise referenced by this indicator that meet the requirements.

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 in public documentation all the elements required in the methodology for a positive score.  
See page 6 and 7 of the benchmark report for more details of the research process.

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

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

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

As CHRB Ltd, we want to emphasise that the results will always be a proxy for good human rights management, and not an absolute measure of performance. This is because there are no fundamental units of measurement for human rights. Human rights assessments are therefore necessarily more subjective than objective. The Benchmark also captures only a snap shot in time. We therefore want to encourage companies, investors, civil society and governments to look at the broad performance bands that companies are ranked within rather than their precise score because, as with all measurements, and particularly one as new as the CHRB which is in its pilot phase, 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. As noted on the CHRB website, CHRB will be conducting an open consultation on this pilot phase and we encourage feedback on the pilot as part of this spirit of continual improvement.