

EXAMPLES OF GOOD CORPORATE REPORTING ON HUMAN RIGHTS

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What does good corporate reporting on human rights look like?

Based on consultations with multiple investors, analysts and company representatives, we offer the following indicators that look beyond the quantity of information reported and consider the quality of the information included. *Note: quantity in this instance is considered to mean the number of questions under the UN Guiding Principles Reporting Framework and the amount of information per question.*

Quality indicators for corporate reporting on human rights:

1. **Governance:** Does the reporting explain how the company's governance structures support the management of human rights risks?
2. **Specific processes:** Does the reporting go beyond high-level statements of policy and commitment and discuss specific processes for implementing respect for human rights?
3. **Specific impacts:** Does the reporting refer to specific impacts that occurred within the reporting period and are associated with the company's operations or value chain?
4. **Clear examples:** Does the reporting provide clear, relevant examples of how the company's policies and processes have influenced practice and outcomes within the reporting period?
5. **Stakeholder perspectives:** Does the reporting explain how the company gains the perspective of stakeholders who could be negatively impacted?
6. **Challenges:** Does the reporting discuss complex or systemic human rights challenges and how the company grapples with them?
7. **Metrics:** Does the reporting include specific data, key performance indicators or other metrics that offer clear and relevant evidence to support the narrative?
8. **Forward focus:** Does the report include information about the company's plans for advancing its efforts to respect human rights?
9. **Strategic initiatives:** If the reporting references particular initiatives, e.g., projects, third-party assessments or participation in industry or multi-stakeholder organizations, does it make clear how these initiatives help the company advance its own management of human rights risks?
10. **Improving disclosure:** Where this is not the first year of human rights reporting for the company, does the reporting show improvements in the quality of its disclosure in comparison with previous years, taking into account the indicators set out above?

Below we offer examples of how some companies' reporting has met these indicators to a moderate or strong degree. Examples are drawn from the reporting of AngloAmerican, Coca-Cola Company, Ericsson, Gap Inc., H&M and Unilever. These are not the only companies whose reporting offers good examples, nor are these examples the only ones that could be found in their reporting. However, they are offered as inspiration for writers and readers of corporate reporting as they consider how to improve the quality of human rights disclosure.

Regarding this collection of examples:

- For each company, excerpts are drawn from a single source of that company's disclosure.
- Reports of different types are included. This means that text from annual sustainability reports may be cited alongside text from country reports, or other report types.
- Inclusion of an excerpt in this resource is not a judgment of the quality of a given company's overall human rights disclosure.

Reports cited:

Disclosure reviewed in detail; relevant excerpts included below:

- AngloAmerican, [*Sustainable Development Report 2014*](#)
- Coca-Cola Company, *Responsible Investment in Myanmar*, [2013 report](#); [2014 update report](#)
- Ericsson, [*Ericsson Sustainability and Corporate Responsibility Report 2014*](#)
- Gap Inc., [2011/2012 Social & Environmental Responsibility Report](#)
- H&M, [*Conscious Actions: Sustainability Report 2014*](#)
- Unilever, [*Human Rights Report*](#), 2015

1. Governance: Does the reporting explain how the company’s governance structures support the management of human rights risks?

Company example	Excerpt
AngloAmerican Sustainable Development Report 2014 (pp. 32-33)	<p><i>“For each incident resulting in loss of life or a critical injury, an independent investigation is conducted, remedial actions taken, and the lessons learned from the incident are shared via the Group LFI process and discussed at Board Sustainability Committee and executive management levels... Leading performance indicators, such as HPis, preventative actions and risk mitigation are reported routinely to the Board and the executive management of the Group.”</i></p> <p>[LFI = learning from incidents; HPI = high-potential incidents]</p>
Ericsson Sustainability and Corporate Responsibility Report 2014 (p. 11)	<p><i>“The Board of Directors of the Parent Company is briefed twice a year on sustainability and CR matters; more often if needed. In 2014, briefings covered sustainability and CR strategies and risks, performance, internal operations, OHS, environment, human rights challenges, and sales compliance processes and results.”</i></p> <p>[CR = corporate responsibility; OHS = occupational health and safety]</p>
Unilever Human Rights Report (p. 20)	<p><i>“Our work in human rights is overseen by Unilever’s Chief Executive Officer and supported by the Unilever Leadership Executive – including the Chief Supply Chain Officer, Chief Human Resources Officer, Chief Marketing and Communications Officer, Chief Legal Officer – as well as the Chief Sustainability Officer and the Global Vice President for Social Impact. Additional Board-level oversight is provided by the Corporate Responsibility Committee. The Unilever Leadership Executive regularly discusses human rights as part of the overall Unilever Sustainable Living Plan (USLP) strategy, reviewing specific issues when the severity of an actual or potential impact is high, where a business-critical decision needs to be taken, or where substantial financial investment may be needed to address the impact.”</i></p>

2. Specific processes: Does the reporting go beyond high-level statements of policy and commitment and discuss specific processes for implementing respect for human rights?

Company example	Excerpt
AngloAmerican: safety training Sustainable Development Report 2014 (p. 33)	<p><i>“Safety-related training extends to our workforce in various forms, from formal training initiatives to regular or daily safety briefings. Over the past year we have concentrated on embedding and reinforcing five specific steps of our safety programme: leadership; effective planning; front-line supervision; incident management; risk management. The steps are linked: strong leaders provide direction to managers who plan and supervise tasks effectively. Consistent approaches to incident and risk management help us to prevent incidents and learn from those that do occur. It is the intention for all operations to implement safety improvement plans that prioritise these steps based on operational risk</i></p>

	<p>reviews.”</p>
<p>Coca-Cola Company: risk assessment 2013 Responsible Investment in Myanmar report (p. 15)</p>	<p>“In order to bring the high level risk assessment to an operational level, human and workplace rights assessments were organized in October 2012. Follow-up audits were conducted in April and November 2013. For the October 2012 assessments, a team was assembled to conduct an enhanced Supplier Guiding Principles (SGP) review of the two bottling plants in Yangon, Myanmar that later became part of CCPBM. The team consisted of two independent auditors, two local translators and two representatives from Coca-Cola Global Workplace Rights. The team spent nearly two weeks in the two bottling plants, surveying the community bordering the plants as well as two independent distributors. In total, the team invested approximately 450 hours in the field during this field assessment. For the October, April and November assessments, the auditors completed a document review, a facility walk-through, confidential employee interviews and an opening and closing meeting with the management to discuss the process and findings.” [CCPBM = Coca-Cola Pinya Beverages Myanmar, Ltd.]</p>
<p>Ericsson Sustainability and Corporate Responsibility Report 2014 (p. 15)</p>	<p>“Human rights risk management is embedded into our operations through our Sales Compliance process. This is particularly relevant for the continuing assessment and prevention and mitigation of potential impacts related to freedom of expression and privacy. A Sales Compliance Board, supported by a Sales Compliance Core Team, governs the process. The cross-functional, senior-level Sales Compliance Board represents Legal Affairs, Trade Compliance, Government and Industry Relations, Sales, Marketing and Communications, business units, and Sustainability and Corporate Responsibility. It meets bi-monthly to review cases, in particular those with potentially negative human rights impacts. The Board may approve with conditions or reject cases, or in specific cases recommend that human rights impacts assessments for specific countries be conducted...</p> <p>“The Sales Compliance Core Team meets bi-weekly to review cases, using expertise from several functions and departments to discuss potential impacts and review policies. The team looks at sales requests, and when necessary, determines what mitigation actions should be undertaken, for example, that implementing staff at the operator must have the right product or service training before a contract is concluded. Involving different departments helps ensure that any decision considers multiple angles, in order to reduce the risk that Ericsson’s technology directly or indirectly impacts negatively on human rights.</p> <p>“Criteria for evaluation: Sales that trigger one or more of the following criteria are evaluated in the sales compliance process for human rights risks: >> Portfolio: This concerns the control over the product or service functionality and the content delivered. >> Purpose: This concerns understanding the purpose and context in which the product, service or know-how will be used. >> Customer: This focuses on enhancing our understanding about to whom we sell/deliver</p>

	<p>>> <i>Country: This provides insight about the country to which we deliver, based on the risk indices of a global risk analytics firm in areas such as human rights risks; corruption; democratic governance; freedom of opinion and expression. Countries requiring extra attention are those under sanctions as well as other countries ranked as a high risk based on a external risk indices. We recognize this is an ongoing process and continuously monitor international developments.”</i></p>
<p>Gap Inc.: risk assessment 2011/ 2012 Social and Environmental Responsibility Report (pp. 37-38; p. 56)</p>	<p><i>“Our approach to monitoring relies on a number of tools and procedures that help us assess our human rights impacts. We assess working conditions throughout the entire duration of our relationship with a given vendor, and analyze current and emerging issues through the use of regional strategy maps, analysis of audit reports, compliance with our Code of Vendor Conduct, and evaluation of factory performance to inform where we allocate our resources, which requires close collaboration between our Social and Environmental Responsibility and Sourcing departments. Further, we understand the potential negative consequences of our own operational decisions (i.e. order changes), and are mindful of vendors’ capacities in our human rights risk assessment processes.</i></p> <p><i>“We recognize that decisions made by production and sourcing teams at Gap Inc. can have significant impacts on workers in our supply chain... In 2011, we created a Brand Integration and Vendor Performance project team at Gap Inc. to help our company better leverage vendor data to drive business decisions, including order placement.” (pp. 37-38)</i></p> <p><i>Gap Inc. further states that Social and Environmental Responsibility staff is, “meeting with leaders in the Gap Inc. Sourcing department to examine any issues related to working conditions that may have stemmed from our decisions at headquarters; developing a virtual training tool that can be used by our employees globally to understand our company’s social and environmental responsibility efforts, with a focus on how our purchasing decisions can impact local communities around the world; [and] training all new hires in inventory management, merchandising, production, and sourcing on the importance of responsible purchasing practices; and highlighting case studies and tools to ensure that factory orders are made with a full understanding of their potential impact on workers.” (p. 56)</i></p>
<p>Unilever: working hours Human Rights Report (p. 44)</p>	<p><i>“Many issues related to excessive working hours occur in our agricultural supply chain where harvesting seasons often dictate productivity levels and hours. Our time management system must be flexible enough to respond to the realities of agricultural production, making it essential that we analyse the activity in question and identify periods or activities that pose a risk of non-compliance. Harvest periods are an obvious case but there may be unforeseen events such as severe weather that will require exceptional hours as well. In these cases, we set a clear approach to peak periods and exceptional circumstances so that the supplier and the workers know what effort may be required and how it will be compensated. Examples include acknowledging that mandatory overtime may be required but specifying that workers must agree to that at the time of hire and that it must be compensated at a premium rate; and rest days and premium payment rates must be respected etc. Any in-kind forms of compensation must be agreed to</i></p>

by workers in advance and must be calculated at market rates with records of all these exceptions maintained and reviewed throughout the year.”

3. Specific impacts: Does the reporting refer to specific impacts that occurred within the reporting period and are associated with the company’s operations or value chain?

Company example	Excerpt
<p>AngloAmerican Sustainable Development Report 2014 (p. 65)</p>	<p>“During 2014, we confirmed five Level 3 (medium impact) and one Level 4 (high impact) incidents relating to water. No Level 5 incidents were reported. The Level 3 incidents involved three unauthorised mine-water discharges at our Coal operations in South Africa, a hydrocarbon spill at our Australian Coal business, and at Iron Ore Brazil, a discharge of treated sewerage in the tailings dam, which resulted in fish kills at the tailings dam and Passa Sete stream. The Level 4 incident involved an acidic water discharge at Coal South Africa’s Landau mine causing some water discolouration and metal precipitation in the stream... Our Los Bronces copper operation in Chile was fined, in 2014, for non-compliant remedial activity following a waste dump acid-drainage incident in 2013...”</p>
<p>Coca-Cola Company: 2013 Responsible Investment in Myanmar report (p. 15)</p>	<p>“The October 2012 bottling plant assessment findings included:</p> <ul style="list-style-type: none"> • Discrimination: There was an indication of discriminatory hiring and payment practices. At the time of the assessment women were paid approximately 11% less than male colleagues. • Hours of Work: Overtime above legal limits was observed and rest days as well as annual leave were not properly provided • Wages and Benefits: Overtime payment were either not provided or improperly calculated • Health and Safety: Improvements were required in areas such emergency exit signage, handrails and seating for workers. Potable water was available, but access could have be expanded through an increase in water stations... • Environment: Issues related to environmental degradation were discovered. At the time of the October 2012 assessment, water for use in plant operations was extracted without a permit and wastewater was being discharged without treatment.”
<p>Unilever Human Rights Report (p. 38)</p>	<p>“Regrettably, between 2007 and 2014, there were 48 road traffic-related fatalities involving Unilever employees on company business and members of the public, as well as more than 250 injuries and 5,000 accidents. An area of priority for us is reducing road traffic accidents. Much of our business growth comes from developing markets where our sales people are at increased risk from travel because of poor local road infrastructure. Our Safe Travel programme, developed collaboratively with Cranfield University in the UK, helped achieve a considerable reduction in driving-related fatalities in 2013 compared with 2012. The programme is led by a senior manager in each country where we operate who coordinates a Safe Travel committee to identify local risk and then develop and</p>

implement safe driving standards. Drivers are provided with training and technology based on the local risk assessment... We will be mandating a global ban on the use of mobile phones, including hands-free, when driving on company business from 1 July 2015.”

4. Clear examples: Does the reporting provide clear, relevant examples of how the company’s policies and processes have influenced practice and outcomes within the reporting period?

Company example	Excerpt
<p>AngloAmerican Sustainable Development Report 2014 (p. 34)</p>	<p>“Following two fatal public-road transportation incidents early in 2014, a transportation task team under senior leadership was established in April to conduct a full review of transport processes across the Group and co-ordinate, manage and oversee strategic transportation safety-related projects. The following key public-road safety performance initiatives have been informed by reviews of best practice and the findings from a transportation of people audit conducted by the S&SD risk and assurance team in 2013.</p> <ul style="list-style-type: none"> • In conjunction with the Group supply chain team, a new standardised transportation contract has been initiated, which mandates the inclusion of improved safety elements in any future contract. Associated fatal-risk standards have been updated to include minimum bus design standards and a best-practice document has been included for light vehicles. • We are developing the use of mobile-device technology to improve journey management, information and planning. This will be piloted in 2015. • Interventions to mitigate poor human behaviour, which is attributed to more than 80% of all road deaths, include providing driver training and assisting with driver selection and management criteria. <p>Two pilot projects are under way aimed at improving safety on high-risk stretches of road serving our operations: at Platinum’s Mogalakwena operation, and Phosphates’ Catalão operation in Brazil.” [S&SD = Safety and Sustainable Development]</p>
<p>Coca-Cola Company 2014 Responsible Investment in Myanmar report (p. 7)</p>	<p>“The majority of findings were resolved in 2013; the findings as well as mitigation listed below are those that remained outstanding at the time of the December 2013 report submission:</p> <ul style="list-style-type: none"> • Hours of Work: During the initial audit, overtime above legal limits was observed and rest days as well as annual leave were not properly provided. To address this, shift patterns were changed in some functional areas, a third shift was added, and additional staff have been hired. Follow-up audits confirmed that this led to an overall downward trend of staff working in excess of the maximum overtime law and working on their rest days. Unfortunately, due to challenges with hiring and retaining skilled labor, during peak season a follow-up audit uncovered a number of instances in which workers continued to work more than the overtime limits. A comprehensive plan is being implemented which includes a prioritized recruitment plan for the those roles where overtime limits were exceeded, a

	<p>review of scheduling and shifts by function, a retention plan including improved induction, onboarding and people leadership training together with a company-wide, comprehensive salary review;</p> <ul style="list-style-type: none"> • Wages and Benefits: The initial audit indicated that overtime payments were either not provided or improperly calculated. To address this issue, the facility has been moving piece rate workers into prescribed shifts to eliminate excessive overtime. The follow-up audits in 2013 and again in 2014 confirmed this process is ongoing; • Medical Clinic: During the initial review, there was no medical clinic at either plant site per local law. Since that time, the medical clinics at both sites have become operational; • Childcare facilities: The initial audit in 2012 revealed that there were no onsite childcare facilities as required by local regulation. Childcare facilities remain as work in progress due to the renovations and construction at the sites. Facilities are planned to be operational by Q4 2014; • Health and Safety: Access to potable water has been expanded through an increase in water stations. Other required improvements, including handrails and better seating for workers, remain outstanding as the plant undergoes renovations.”
<p>Gap Inc. 2011/ 2012 Social and Environmental Responsibility Report (pp. 48-49)</p>	<p>“Case study: Fostering consensus and dialogue in Cambodia’s garment sector: “...In 2011 and 2012, a series of strikes occurred in Cambodia’s garment industry, mainly driven by workers demanding increases in wages and benefits. Gap Inc. sourced from several of the factories affected by these strikes. Sometimes management would negotiate an agreement with the most representative union, only to have another union initiate a strike with slightly higher demands in an effort to win members... As a result of the strikes, the Garment Manufacturers Association of Cambodia and the eight major union confederations and federations (representing a majority of the unions officially registered with the Cambodian government) negotiated a Memorandum of Understanding. It went into effect on October 3, 2012, and is in effect for two years. In coordination with other key buyers in Cambodia, Gap Inc. played an active role in helping foster the negotiations that led to its creation. The Memorandum of Understanding has several key consequences:</p> <ul style="list-style-type: none"> • Encouraging the use of Collective Bargaining Agreements (CBA) to protect the rights of both workers and factory owners. • Addressing the complexities of having so many unions in a single facility by mandating that the union representing the most workers in a given facility will lead in CBA negotiations with the employer, thus representing all workers in a factory. • Tasking an independent Arbitration Council to review and arbitrate labor disputes between workers and factory owners.... • Agreeing that in the absence of a CBA, and when mediation fails to resolve an issue, both parties will accept the Arbitration Council’s ruling as final and binding for all rights-related disputes. • Creating a working group of representatives from trade unions and the Garment Manufacturers Association

	<p>of Cambodia to address issues surrounding short-term contracts for workers.</p> <ul style="list-style-type: none"> • Initiating a national policy dialogue on productivity. <p>We are hopeful that this Memorandum of Understanding will help improve industrial relations and working conditions in Cambodia. Formalizing a dispute resolution process helps resolve urgent issues in a way that is transparent, collaborative, efficient, and respected both by unions and employers.”</p>
<p>Unilever Human Rights Report (p. 54)</p>	<p>“In a continual effort to engage important stakeholders, we asked many of our suppliers for feedback on the robustness of the Responsible Sourcing Policy as well as our renewed efforts at addressing human rights issues and monitoring progress. What we heard was insightful. At one supplier, for example, the first audit in 2012 revealed three non-conformances including issues around health and safety. The supplier made the necessary improvements following which a fire occurred with 70 people at work in the factory. Fire management reported that everyone was safely evacuated, thanks to the improvements, even though the entire factory was gutted, demonstrating the power of the policy, audits and linking the improvements to our commercial relationship with suppliers as an incentive for improvement.”</p>

5. Stakeholder perspectives: Does the reporting explain how the company gains the perspective of stakeholders who could be negatively impacted?

Company example	Excerpt
<p>Coca-Cola Company: risk assessment 2013 Responsible Investment in Myanmar report (p. 23; pp. 17-18)</p>	<p>“In the case of Myanmar, we recognized that stakeholder engagement was at the very center of our due diligence activities. Stakeholder engagement, especially with potentially affected stakeholders, was deemed critical to identify existing and potential human rights impacts. Due to the high risk of adverse human rights impacts in the country, we developed a tiered strategy to ensure we gathered a variety of perspectives from the international to the community level. In particular, this meant engaging in ongoing dialogue with international and multi-lateral organizations, socially responsible investors, credible human rights civil society at the national level, and community members and workers impacted by potential business operations. The Coca-Cola Company also evaluated existing stakeholder engagement by the then potential local partner company. One plant is located in a small village and while no historical issues have been reported from the host community or adjacent establishments, there is currently no formal way to manage dialogue and/or complaints... Going forward a community engagement program is part of the CCPBM annual business plan.” (p. 23)</p> <p>The report also states: “...an elected joint employee/management Workplace Coordinating Committee (WCC) was recently formed for employees to channel their suggestions, raise issues and make</p>

	<i>recommendations to management. The forum considers such topics as conditions of employment, occupational health and safety, welfare and productivity.” (pp. 17-18)</i>
Unilever Human Rights Report (p. 35)	<i>“We prohibit sexual harassment in the workplace and any concerns that are reported and found accurate will result in disciplinary and corrective action. To date, we have focused the majority of our efforts on promoting gender sensitivity. To create a productive and safe environment, we have engaged our employees in developing a deeper understanding of the issue. We engaged our employees by asking them to submit messaging that would simplify and define our codes on preventing and addressing sexual harassment into succinct and relatable phrases. The goal was to create a list of simple and relevant phrases to convey our commitment to reducing the number of sexual harassment incidents, engaging our employees in the communications process. After reviewing hundreds of messages sent through a variety of channels including email, SMS and letters, a panel from across all company units selected a series to be distributed throughout the operations. This enabled our employees to participate in spreading awareness on an important issue.”</i>

6. Challenges: Does the reporting discuss complex or systemic human rights challenges and how the company grapples with them?

Company example	Excerpt
AngloAmerican Sustainable Development Report 2014 (p. 30)	<i>“In South Africa, the labour relations climate remains a particular challenge and concern. Labour instability has been exacerbated by inter-union conflict, and is underpinned by ongoing systemic societal challenges that are deeply rooted in the country’s history and in the legacy of the migrant labour system. The five-month strike in the platinum industry by the majority trade union AMCU highlighted the adversarial nature of the situation. The strike was eventually concluded through dialogue and collaboration, with a three-year agreement signed on 24 June and backdated to July 2013. The process nonetheless exacted a significant toll and reflected the need for us to improve relations with our employees and their representative bodies.”</i> [AMCU = South African Association of Mineworkers and Construction Union]
Coca-Cola Company 2013 Responsible Investment in Myanmar report (p. 26)	<i>“When planning new plant sites, we will strive to ensure that Free, Prior and Informed Consent is obtained. In the case of Myanmar, both plants are pre-existing and investigations could not clarify how the grant or garden lands were obtained by the government. We recognize the importance of land rights and are engaging in ongoing community engagement to ensure sensitivity to issues related to customary usage rights.”</i>
Gap Inc. 2011/ 2012 Social and Environmental Responsibility Report (pp. 51-52)	<i>The Sumangali scheme is a violation... and we do not approve apparel factories that use this practice. Knowing that addressing systemic issues requires an industry-wide, locally inclusive approach, we took a leadership role in establishing an industry working group through the Ethical Trading Initiative.... we helped create an initial roadmap</i>

	<p>with the Tamil Nadu Working Group and the Ethical Trading Initiative to address the Sumangali issue. The roadmap is built on a three-pronged strategy: 1. Work with the Ethical Trading Initiative, the International Labour Organization, non-governmental organizations, and local government to develop locally based programs. 2. Support local NGOs to educate local communities to aid in prevention. Implement an outreach and awareness plan at the community level in Tamil Nadu to highlight the problems associated with Sumangali schemes and brands' expectations toward their abolition. This includes setting up orientation and training for schools, teachers, parents, health workers, and factory managers to promote rights awareness for female garment workers in the region. 3. Support government involvement to aid enforcement..."</p> <p>[NGO = nongovernmental organization]</p>
<p>H&M 2014 sustainability report (pp. 49-50; p. 51)</p>	<p>"Where unionisation is restricted by law or where systems are insufficient, we work to empower workers with awareness about their rights at work and to help our suppliers establish functioning and democratically elected workplace representation. The aim is that these will develop into mature collective bargaining systems. Beyond the factory level, we work with governments and other partners such as unions to promote the required legal frameworks and help to mature the concept of solution-oriented negotiations amongst both employers and worker representatives... Given widely varying pre-conditions from market to market, we will apply locally adapted approaches to achieve this. This means that where functional union and collective bargaining systems exist, we will continue to help strengthen them. Where this is not the case, we will work with our strategic suppliers to develop factory-based worker representation that is democratically elected." (pp. 49-50)</p> <p>"In China, freedom of association is restricted by law. At the same time, the Chinese garment sector increasingly faces challenges such as labour shortages and turnover issues as well as labour conflicts. Recent developments in Chinese legislation reflect a strong need for better employee relations and provide great opportunities for the development of democratically elected worker committees. That's why, building on our experiences in Bangladesh, we have now launched a social dialogue project in China as well. The aim is to promote awareness of workers' rights and responsibilities, two-way communication between management and workers, peaceful conflict resolution and collective consultation in Chinese factories. The management, HR staff, CSR staff, supervisors and worker representatives will take part in a series of training courses and assessments that will give them the skills and knowledge needed to have a constructive dialogue about issues that are important to the workers. We started in autumn 2014 with two strategic suppliers and aim to add another 8 suppliers in spring 2015." (p. 51)</p>
<p>Unilever Human Rights Report (p. 50)</p>	<p>"In September 2014, we engaged an external organisation to carry out an independent assessment of our tea supply chain in Turkey. Our goal was to understand the working conditions of a large population of migrant workers from neighbouring Georgia who are regularly employed by our suppliers during Turkey's short harvest season... The assessment found that this income was vital to workers' livelihoods... However, the assessment found</p>

	<p>significant and pressing challenges as well – most of them endemic and needing to be understood and resolved at the industry level, including:</p> <ul style="list-style-type: none"> • The existing regulatory environment needs improvement relating to the registration of these workers and the protection of labour standards. • Excessive working hours during the harvest were evident in our tea supply chain. • Several health and safety non-conformances were found at some supplier sites including inadequate first aid facilities, lack of protective equipment, and inadequate emergency exits. • The accommodation for migrant workers at some of our supplier sites did not meet required standards. <p>Our response was:</p> <ul style="list-style-type: none"> • We will remediate the issues identified by the assessment at the individual site level and also work with external multi-stakeholder groups to address systemic challenges. An internal cross-functional group will spearhead this work. • We have started a capacity building initiative in Turkey that focuses on human rights. • A specific workshop will emphasise a number of the identified issues and foster a discussion on how we can work together collectively to begin to improve practices. • We are planning an RSP event with local suppliers. We will be focusing on tea and foods suppliers and labour related issues. We will concentrate on educating suppliers on labour rights and best practices and on implementing effective and sustainable solutions.”
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7. Metrics: Does the reporting include specific data, key performance indicators or other metrics that offer clear and relevant evidence to support the narrative?

Company example	Excerpt
<p>AngloAmerican: grievance mechanisms Sustainable Development Report 2014 (p. 23; p. 44)</p>	<p>“During 2014, we received 302 alerts (2013: 372). Every alert is evaluated and, where appropriate, investigated. The largest proportion of reports in 2014 related to human resources issues (around 50%), followed by a range of other matters, including procurement, accounting, and health and safety. In total, 226 alerts were closed following investigation, of which 43 resulted in management action. (p. 23)</p> <p>“During 2014, 2,867 incidents were reported across the Group, with 12% of these classified as medium-major impact Level 3 to 5 incidents. Level 3 to 5 social incidents are reported to the Board and included in the chief executive’s bi-monthly performance scorecard... our Minas-Rio project in Brazil experienced a high number of community complaints associated with the influx of contractors; in response, we implemented an initiative to</p>

	<i>sensitise contractors about their behaviour in communities. During 2014, more than 7,350 contractors participated in the programme and more than 5,490 guides on good behaviour were distributed. Since the training was conducted, the number of incidents of complaints has decreased substantially.” (p. 44)</i>
H&M 2014 sustainability report (p. 40)	Regarding living wages: “monthly average wages at H&M supplier factories vs. applicable minimum wages in selected countries” (Bangladesh, Cambodia, China, India, Indonesia, Turkey and Vietnam) show steady increases between 2012-2014. H&M also discloses wage increases expressed as percentages over the same time period, which shows that percentages are increasing in all countries except Bangladesh, India, and Indonesia. Data sets are, “based on audit results from randomly selected factories in each country/region. Based on basic wages excl. overtime for machine operators, which are usually the largest group of employees. In China, piece-rate systems often apply, hence wage data for China is not fully comparable to other markets. Figures are converted to USD using comparable exchange rates.” Also see graphic at end of document.
Unilever Human Rights Report (p. 39)	“We are among the leaders in our industry on safety. In 2013, we achieved our target of halving the number of accidents in our factories and offices compared with 2008. We measure this using our Total Recordable Frequency Rate (TRFR), which counts all workplace injuries except those requiring only simple first aid treatment. In 2014, our TRFR rate increased slightly to 1.05 per million hours worked, due to a spike in injury rates at the beginning of the year. We renewed our focus on our safety programmes to bring our injury rates back down. That said, health and safety was the third most internally reported salient human rights issue within our own operations in 2014 with Brazil reporting the highest number of cases.”

8. Forward focus: Does the report include information about the company’s plans for advancing its efforts to respect human rights?

Company example	Excerpt
Coca-Cola Company 2013 Responsible Investment in Myanmar report (p. 17)	“As issues arise in the future, the Company expects a new operational level grievance mechanism will help identify any potential noncompliances or adverse human rights impacts and enable the facility to address issues early to prevent further escalation. In addition to facility specific grievance procedures, there will be ongoing compliance audits during which confidential employee interviews enable workers to raise concerns. Furthermore, CCPBM employees can report potential Human Rights Statement or Workplace Rights Policy violations to their Human Resources department, through the EthicsLine secured Internet website at www.koethics.com or by calling the appropriate toll-free number for their location. The Company treats all inquiries confidentially and investigates all concerns.” [CCPBM = Coca-Cola Pinya Beverages Myanmar, Ltd.]

<p>Ericsson Sustainability and Corporate Responsibility Report 2014 (p. 20)</p>	<p><i>“A program 'Zero Incidents in High-Risk Environments' was established in early 2014 to reduce severe incidents in high-risk operations in both Ericsson’s own activities and in the supply chain. The Zero Incidents program will increase OHS training and awareness of project managers, field service personnel and sub-contractors. It will reinforce governance and global tools, including instructions, check lists, training materials and escalation procedures. If persistent violations occur, the supplier contract may be ended. The Zero incident program pilot was launched in early 2015 in the Netherlands, India and Egypt, and global rollout will follow later in 2015 and the first half of 2016.”</i></p>
<p>Gap Inc. 2011/ 2012 Social and Environmental Responsibility Report (p. 35)</p>	<p><i>“We know that the tools we use could be enhanced to give us added insight into our human rights practices. Accordingly, we are seeking to improve how we measure the outcomes and impacts of our efforts, rather than measuring success by the number of activities we pursue or the degree to which we implement them. This is a shift in measurement that will take considerable innovation as we tackle complex questions about what constitutes impact. For example, is impact the absence of problems or crises? If impact is the creation of value, how do we define that value? Over the next two years, the answers to such questions will inform how we develop new measurement and analysis tools... This process is at an early stage, and we look forward to providing detailed updates in our next report.”</i></p>
<p>Unilever Human Rights Report (p. 29)</p>	<p><i>“We are creating a Framework for Fair Compensation. The first stage of this work is to define fair wages and analyse our compensation models across 180 countries. We engaged the Fair Wage Network to conduct a review of entry-level wages in our factory sites against a variety of fair wages indicators. In most cases, our wages exceeded the median country fair wages rate, although we identified a small number of immediate concerns which we are addressing. The next step is to set up independent benchmarks, identify gaps, address these gaps and establish a framework for fair compensation. This framework must then be fully embedded, monitored, reviewed annually and have an accompanying methodology to monitor our employees’ rewards against these indicators. As we roll this out, we recognise the critical role that collective bargaining agreements play in setting and promoting fair wages... In the next three years, we will extend our fair wage analysis to our third party labour suppliers and outsourced service providers and continue working in partnership with others to address wages issues in particular commodities and countries.”</i></p>
<p>Unilever Human Rights Report (p. 43)</p>	<p><i>“As we began engaging suppliers and other stakeholders on our Responsible Sourcing Policy, land rights emerged as one of the issues for which our suppliers requested more information and guidance, especially in urban settings. But issues related to land rights aren’t restricted to our extended supply chain. They remain a core focus area for us across our own operations, for example in the building of new factories or other assets. We are, therefore, creating a new Global Land Rights Policy, which will include principles and due diligence applicable to all our operations, suppliers and business partners, and information on consultation, consent and transparency as well as environmental considerations. We will finalise the policy in 2015 and shortly thereafter issue a Standard Operating Procedure and</i></p>

training materials for dissemination throughout our value chain.”

Strategic initiatives: If the reporting references particular initiatives, e.g., projects, third-party assessments or participation in industry or multi-stakeholder organizations, does it make clear how these initiatives help the company advance its own management of human rights risks?

Company example	Excerpt
AngloAmerican Sustainable Development Report 2014 (p. 45)	<p>“As a member of the ICMM, we committed to the 2013 ICMM Position Statement on Indigenous Peoples and Mining, which endorses the principles of Free, Prior and Informed Consent (FPIC), and we have incorporated this commitment into our updated Social Way. Aligned with the Position Statement and our own updated policy, we accordingly seek to obtain the consent of Indigenous Peoples for all new projects (and changes to existing projects) that are located on lands traditionally owned by, or under customary use of, Indigenous Peoples and are likely to have significant adverse impacts on them.”</p> <p>[ICCM = International Council on Mining and Metals]</p>
H&M 2014 sustainability report (p. 48)	<p>“Our goal is that all workers at H&M supplier factories should have access to relevant skills development programmes – and have employment and a wage that reflect their skills. As part of this, we will continue with an important project that we started in 2013 together with the ILO and the Swedish International Development Cooperation Agency (SIDA) in Bangladesh. In a joint centre of excellence, we aim to train 5,000 students until the end of 2016. In China, we initiated a career-training programme reaching out to about 8,000 young migrant workers in 9 factories. Based on these experiences we will set up or connect with further local projects, based on local needs and conditions.”</p> <p>[ILO = International Labour Organization]</p>
Unilever Human Rights Report (p. 31)	<p>“The tea industry employs millions of people around the world. Many countries where tea production takes place are poor with low minimum wages. Since 2013, we have been working with Oxfam, the Ethical Tea Partnership, IDH* and others to better understand wages in the industry. This work began with an in-depth analysis of pay and benefits in India, Indonesia and Malawi. We now are focusing more extensively on Malawi, where, despite tea estate jobs paying above the legal minimum wage and providing other benefits, standards of living are still extremely low. The coalition has worked to develop reasonable fair wages benchmarks for Malawi. A Malawi Supply Chain MOU, which Unilever, other tea producers, buyers and retailers, wage experts, local unions, certification organisations, NGOs and the Malawian Government and others have signed, looks at a number of different drivers of meaningful change, including making more finance available, increasing worker representation within unions, training smallholder farmers in good practices and improving living standards and working conditions. We are in dialogue with a range of stakeholders including the Malawian Government, industry, international tea buyers and retailers, wage experts, local</p>

unions, certification organisations and NGOs to tackle this issue. This cross-sector engagement is what we believe is needed to drive meaningful, sustainable change.”
[IDH = The Sustainable Trade Initiative; MOU = memorandum of understanding; NGO = nongovernmental organizations]

10. Improving disclosure: Where this is not the first year of human rights reporting for the company, does the reporting show improvements in the quality of its disclosure in comparison with previous years, taking into account the indicators set out above?

a. Example of improved disclosure on stakeholder engagement from Coca-Cola Company 2013 Myanmar report vs. 2014 Myanmar report

As shown below, between 2013 and 2014, Coca Cola improved their disclosure by reporting more specific information about its local stakeholder engagement processes and outcomes, whereas the 2013 report reported on general stakeholder engagement.

2013 Responsible Investment in Myanmar report: *“In the case of Myanmar, we recognized that stakeholder engagement was at the very center of our due diligence activities. Stakeholder engagement, especially with potentially affected stakeholders, was deemed critical to identify existing and potential human rights impacts. Due to the high risk of adverse human rights impacts in the country, we developed a tiered strategy to ensure we gathered a variety of perspectives from the international to the community level. In particular, this meant engaging in ongoing dialogue with international and multi-lateral organizations, socially responsible investors, credible human rights civil society at the national level, and community members and workers impacted by potential business operations. The Coca-Cola Company also evaluated existing stakeholder engagement by the then potential local partner company. One plant is located in a small village and while no historical issues have been reported from the host community or adjacent establishments, there is currently no formal way to manage dialogue and/or complaints... Going forward a community engagement program is part of the CCPBM annual business plan.”* (p. 23)
[CCPBM = Coca-Cola Pinya Beverages Myanmar, Ltd.]

2014 Responsible Investment in Myanmar report: *“Stakeholder engagement continues to be an integral part of our work in Myanmar. The Company shared the initial Responsible Investment report with local civil society and government agencies to solicit feedback and to share the Company’s commitment to Myanmar. In addition, the Company maintains regular dialogue with local community leaders as part of a recently formalized community engagement plan. Through such community engagement The Coca-Cola Pinya Beverages Myanmar (CCPBM) team worked with the Township Office and local residents to listen to and work through concerns raised regarding plant renovations. As a result of the dialogue, actions taken to date include the construction of noise reduction barriers for the generators, management of water flow from the building works and implementation of a parking plan to*

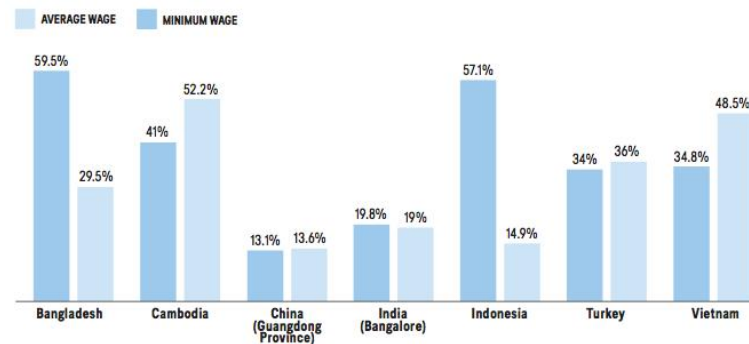
keep the road clear. The fact that concerns were raised and a constructive dialogue followed is a positive indication that local communication channels are functioning. Recent discussions between the CCPBM Communications Managers and the local Township Administrator, Chief of Monastery and various township authorities touched on a number of topics, including annual flooding in the area and donations of emergency drinking water, if needed. There was also an agreement to collaborate on training programs with local government offices, to post job opportunities on community notice boards and agreements regarding regular meetings and updates.” (p. 10)

Graphic referenced on p. 13 of this document
Source: H&M, [2014 sustainability report](#), p. 40

MONTHLY AVERAGE WAGES AT H&M SUPPLIER FACTORIES VS. APPLICABLE MINIMUM WAGES IN SELECTED COUNTRIES IN USD*



WAGE INCREASES IN % FROM 2012 TO 2014*



*Data based on audit results from randomly selected factories in each country/region. Based on basic wages excl. overtime for machine operators, which are usually the largest group of employees. In China, piece-rate systems often apply, hence wage data for China is not fully comparable to other markets. Figures are converted to USD using comparable exchange rates.