

## **HBC**

Banners: The Bay, Zellers, Home Outfitters Type of company: Private Notes:

Notes on Findings	Company Score	Question weighting (% of section)
1. Governance and Risk Management		

1.1 Board level responsibility for ethical issues in the supply chain -There is evidence of a board member with explicit responsibility for ethical issues in the supply chain. http://www.hbc.com/hbc/socialresponsibility/sourcing/	66.7	40
1.2 Reporting of labour standards issues in the supply chain as a risk factor -There is mention of labour standards issues as a risk factor in the annual report.  HBC Annual Information Form 2005, p. 10	66.7	30
1.3 Risk analysis of labour standards issues in the company's existing supply chain  -There is reported evidence of a risk or exposure analysis of labour standards issues in the supply chain  -Break down vendors into 3 levels of priority. Each level focuses resources to perceived risk. i.e. Priority A (high priority): top 200 suppliers based on volume of sales, perceived risk and factory location.  -Note: it is not clear whether "perceived risk" is based on a systematic risk analysis of labour standards issues in the supply chain or just on expectations.  p. 39, 2005 CSR Report	100	30

Section total score / section weighting 76.7 X 10%

## 2. Code for Labour Standards in the Supply Chain

<ul> <li>2.1 Quality and scope of the code for labour standards in the supply chain -There is a "Code of Vendor Conduct" -It is not consistent with ILO core conventions with respect to child labour: -"workers can be no less than 15 (or 14 where the law of the country of manufacture allows)" -It covers the core ILO conventions but limits the company's commitment to: -Freedom of association: "Management practices must respect the right of employees to free association and collective bargaining where applicable." -Discrimination: "We will favour Business Partners who ensure that no employee shall be subject to any discrimination" -It includes a living wage requirement (although without providing information regarding the application of this standard in their supply chain or the definition of this standard in particular countries)It does not meet the ILO hours of work standards</li> </ul>	25	60
2.2 Publication and availability of the code for labour standards in the supply chain -lt is published on their website http://www.hbc.com/hbc/socialresponsibility/sourcing/	100	20
2.3 Application of the code for supply chain labour standards -Code applies to entire breadth of production -"we will only engage business partners who demonstrate a commitmentto meet our requirements stated in this code" See above link	100	20

Section total score / section weighting 55 X 15% 3. Stakeholder Engagement

3.1 Multi-stakeholder processes -No reported evidence of involvement in a multi-stakeholder initiative that includes representation from both NGOs and labourHBC is a member of various initiatives that do not qualify as MSIs, including: CBSR, BSCI, and CRART.	0	30
3.2 Engagement with NGOs and/or trade unions relating to labour standards in the supply chainHBC is a member of various initiatives including: CBSR, BSCI, the UN Global Compact, and CRART Reports engagement with KAIROS, MSN and Play Fair at the Olympics	50	30
3.3 Worker and third party complaints - No reported evidence	0	40

Section total score / section weighting 15 X 20%

4. Management

4.1 Resource Commitment -There is a Senior Manager in the Social Compliance Department but it is unclear how many reporting levels s/he is from the Board http://www.hbc.com/hbc/socialresponsibility/sourcing/	50	25
<b>4.2 Training for Buying agents</b> -Company has training for HBC's buyers to explain the principles of HBC's code of vendor conduct and the company's auditing programs.  p.36-37, 2005 CSR report	100	25
4.3 Training for factory management personnel and workers -No reported evidence of training for factory management personnel or factory workers	0	25
4.4 Rewards and Incentives -No reported evidence	0	25

Section total score / section weighting 37.5 X 20%

5. Supply Chain Auditing and Reporting

<b>5.1 Commitment to auditing labour standards in the supply chain</b> -There is a commitment to auditing all factories that manufacture products for HBC.  p. 38-39, 2005 CSR Report	100	15
5.2 Status of the audit schedule -An auditing work plan has been scheduled and is currently being implemented p. 38, 2005 CSR Report	100	5
5.3 Public disclosure of manufacturing sites -No reported evidence	0	10
5.4 Transparency of the labour standards auditing methodology -The auditing methodology is publicly available and follows generally accepted practices. p. 38, 2005 CSR Report	100	15
5.5 External verification of labour standard audits -Third party audits conducted by Intertek Labtest and Independent Global Compliance ServicesThere is no reported evidence of input from NGOs or labour in the country of supply p. 38, 2005 CSR Report	33.3	20
5.6 Reporting the results of audits of labour standards in the supply chain -There is broad commentary on aggregate audit findings for a sample of factories with 3 audits in 18 months. No specific figures are provided on findings by workplace, country or geographic region. p. 39-40, 2005 CSR report	20	20
5.7 Dealing with non-compliance -There is a publicly available policy for handling instances of non-compliance and it includes a staged approach to dealing with violations.  p. 38: 2005 CSR report	100	15
Section total score / section weighting	60.7	X 35%

Total Score 48 /100