

Seven & i Holdings Co. Ltd.

TICKER
TKS:3382

MARKET CAPITALIZATION US\$39 billion HEADQUARTERS Japan

DISCLOSURES UK Modern Slavery Act: Not appl TARGETS None

UK Modern Slavery Act: Not applicable

California Transparency in Supply Chains Act: Yes (Disclosure of Subsidiary)

OVERALL RANKING

26 out of 43

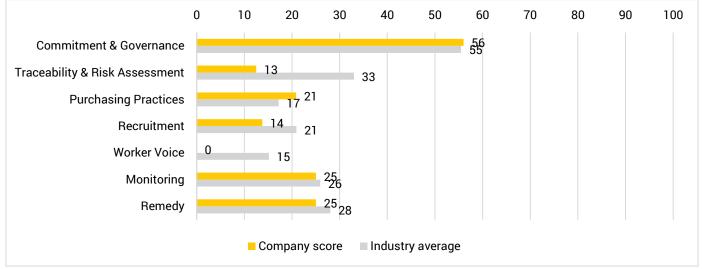
OVERALL SCORE

22 out of 100

SUMMARY

Seven & i Holdings Co. Ltd. (Seven & i), a Japanese retail group that manages and operates convenience stores, supermarkets, and department stores, ranks 26th out of 43 companies, disclosing less information on its forced labor policies and practices than its peers. The company is the highest-scoring Japanese company and second-highest-scoring Asian company. Its score is based on its higher-than-average score on the themes of Commitment & Governance and Purchasing Practices. The company has an opportunity to improve its performance and disclosure on the themes of Traceability & Risk Assessment, Recruitment, and Worker Voice.





Research conducted through February 2020 or through May 2020, where companies provided additional disclosure or links. For more information, see the full dataset <u>here</u>. For information on a company's positive and negative human rights impact, see the Business & Human Rights Resource Centre <u>website</u>.



KEY DATA POINTS

SUPPLIER LIST	NO-FEE POLICY
No	Yes
SUPPORTS FREEDOM OF ASSOCIATION	REMEDY FOR SUPPLY CHAIN WORKERS
No	No
HIGH-RISK COMMODITIES Cattle, fish, rice, and others ¹	ADDRESSES FORCED LABOR RISKS RELATED TO THIRD-PARTY PRODUCTS No

LEADING PRACTICES

None.

NOTABLE FINDINGS

Commitment & Governance: Seven & i has a supplier code of conduct that prohibits forced labor and passport retention, and it discloses internal responsibility for the implementation of this code. It also provides human rights training to both its own employees and its suppliers.

Supplier Selection: The company discloses that it requires its suppliers to agree to adhere to its supplier code of conduct and assesses potential suppliers for compliance with a "CSR audit," which includes an evaluation of forced labor risks.

Corrective Action Plans: The company discloses that where non-compliances are discovered, a thirdparty monitoring organization provides guidance to suppliers on how to improve. It states that suppliers are required to submit a corrective action plan within ten days and evidence of implementation within 90 days. It states that where results are unsatisfactory, the supplier has another opportunity to implement the corrective actions within 90 days before a re-audit is carried out.

OPPORTUNITIES FOR IMPROVEMENT

Traceability & Risk Assessment: The company is encouraged to demonstrate a strong understanding of its supply chains by disclosing the names and addresses of its first-tier suppliers, the countries of its below-first-tier suppliers, the sourcing countries of raw materials at high risk of forced labor and human trafficking, and information on its suppliers' workforce. The company may further consider assessing forced labor risks in different tiers of its supply chains (beyond its supplier survey) and disclosing the risks identified.

Recruitment: While the company's supplier code states that "[w]orkers shall not be unduly required to hand over their identification certificates or to pay a deposit" and while the company discloses that the Employer Pays Principle is included as a category in its CSR audits, the company may consider strengthening its supplier code to include the Employer Pays Principle and to provide evidence beyond audits that recruitment-related fees are reimbursed to the workers and/or that such fees are paid by suppliers.



Worker Voice: To prevent and address forced labor and human trafficking risks in its supply chains, the company may consider ensuring that a formal and effective mechanism to report grievances regarding labor conditions is available and communicated to its suppliers' workers and relevant stakeholders such as worker organizations or labor NGOs. Further, the company is encouraged to take steps to ensure that workers in its supply chains are educated on their rights and are able to exercise their right to freedom of association.

ENGAGED WITH KNOWTHECHAIN

Yes (Provided Additional Disclosure).

¹ The US Department of Labor lists these commodities as commodities that may be produced using forced labor. US Department of Labor (20 September 2018), "List of Goods Produced by Child Labor or Forced Labor."