



DETAILED BENCHMARKING RUBRIC

Theme A

Indicator	Score 0	Score 1	Score 1.5	Score 2	Source of Verification
A1 Policy Commitment to respect human rights	The Company does not have a publicly available statement of policy committing it to respect human rights	The Company has a publicly available statement of policy committing it to respect human rights OR the rights under the Universal Declaration of Human Rights (UDHR) OR the International Bill of Human Rights.	The Company's publicly available statement of policy also commits it to the UN Guiding Principles on Business and Human Rights	Policy statement is communicated to all employees and stakeholders	Policy Statement published on the website or other means which is publicly available, Evidence of communication of policy
A2 Commitment to engage with stakeholders	The business does not have a publicly available statement of policy committing it to engage with its potentially and actually affected stakeholders, or there is no evidence that the business regularly engages with potentially and actually, affected stakeholders	The business has a publicly available statement of policy committing it to engage with its potentially and actually affected stakeholders OR there is evidence that the business regularly engages with potentially and actually, affected stakeholders	NA	The Company's publicly available statement of policy also commits it to engage with affected stakeholders in the development or monitoring of its human rights approach OR there is evidence that the business regularly engages with potentially and actually	Policy Statement published on website or other means which is publicly available, Annual reports, meeting minutes, etc.



				affected stakeholders in the development or monitoring of its human rights approach.	
A3 Commitment to rights of women, migrant workers and promote gender equality	The business does not have a publicly available statement of policy committing to protect the rights of women, and migrant workers and promote gender equality	The business has a publicly available statement of policy committing to protect the rights of women and gender equality	The business has a publicly available statement of policy committing to protect the rights of migrant workers	The business also has an internal policy on Sexual Harassment	Publicly available policies and internal policies
A4 Commitment to Remedy	The Company does not have a publicly available statement of policy committing it to remedy the adverse impacts on individuals, workers, and communities that it has caused or contributed to.	The Company has a publicly available statement of policy committing it to remedy the adverse impacts on individuals, workers, and communities that it has caused or contributed to.	NA	the Company's policy commitment recognizes its approach to remedy should not obstruct access to other remedies, or it includes commitments to collaborating in initiatives that provide access to remedy.	Policy Statement published on the website or other means which is publicly available
A5 Top Management Level Commitment	The business does not have processes in place to discuss and address human rights issues at the top management level or the Board or a	The business describes the process it has in place to discuss and address human rights issues at the top management level	The Company's human rights policy commitments are approved by the top management AND managerial staff is assigned to oversee one or more areas	The business also provides examples of either specific human rights issues, or trends in types of human rights issues	Top management meeting minutes, Procedures to discuss human rights issues at the Board Level, Resolution on roles of board members Job description of managerial staff



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	Board committee		of respect for human rights.	discussed at Board level during the last reporting period	
A6 Commitment to respect the rights of human rights defenders	The company does not have a publicly available statement of policy committing to respect the rights of human rights defenders in relation to its operations.	The company has a publicly available statement of policy committing it to neither tolerate nor contribute to threats, intimidation, and attacks (both physical and legal) against human rights defenders in relation to its operations.	NA	NA	Policy Statement published on the website or other means which is publicly available



Theme B

Indicator	Score 0	Score 1	Score 1.5	Score 2	Source of Verification
B 1 Training on Human Rights	There is no senior level responsibility for human rights within the company as well as the organisation of the day-to-day responsibility for human rights across relevant internal functions.	The Company indicates that all its workers are trained on its human rights policy commitments	NA	the Company describes how relevant managers and workers, receive specific human rights training relevant to their role	Records on Human Rights Training
B2 Identifying human rights risks and impacts	The Company does not proactively identify its human rights risks and impacts on an ongoing basis	The Company describes the process(es) to identify its human rights risks and impacts: in specific locations or activities, covering its own operations	The Company describes the global systems it has in place to identify its human rights risks and impacts on a regular basis across its activities, in consultation with affected or potentially affected stakeholders and internal or independent external	The Company's description includes an explanation of when human rights impact assessments (HRIAs) or environmental and social impact assessments (ESIAs) covering human rights are/will be carried out.	Documents on risk identification, meeting minutes, etc.



			human rights experts.		
B3 Assessment of risks and impacts identified	The company does not have a process(es) for assessing its human rights risks and impacts	The Company describes its process(es) for assessing its human rights risks and impacts and what it considers to be its salient human rights issues including how relevant factors are taken into account, such as geographical, economic, social and other factors OR the Company publicly discloses the results of the assessments, which may be aggregated across its operations and locations	NA	The Company meets both of the requirements under Score 1 AND describes how relevant stakeholders are involved in the assessment process.	SOPs and Risk Assessment Reports



<p>B4</p> <p>Integrating assessment findings internally and taking appropriate Action</p>	<p>The Company does not have a system and has not taken any action to prevent, mitigate or remediate its salient human rights issues</p>	<p>The Company describes its system to take action to prevent, mitigate or remediate its salient human rights issues</p>	<p>NA</p>	<p>The Company meets the requirements under Score 1</p> <p>AND,</p> <p>the Company provides an example of the specific conclusions reached and actions taken or to be taken on</p> <p>at least one of its salient human rights issues as a result of the assessment</p> <p>processes in at least one of its activities/operations</p>	<p>SOPs, Documents as proof of action</p>
<p>B5</p> <p>Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts</p>	<p>The Company does not have a system(s) evaluating whether the actions have been effective</p>	<p>The Company describes the system(s) for evaluating whether the actions have been effective or have missed key issues or have not produced the desired results</p> <p>OR</p>	<p>NA</p>	<p>The Company meets both of the requirements under Score 1.</p>	<p>SOPs, Evaluation Reports, etc.</p>



		<p>it provides an example of the lessons learned while tracking</p> <p>the effectiveness of its actions on at least one of its salient human rights issues</p> <p>as a result of the due diligence process.</p>			
<p>B6</p> <p>Communicati ng</p>	<p>The company does not communicate externally about its human rights impacts and how effective it has been in addressing those impacts</p>	<p>The Company describes or demonstrates how it communicates externally about its human rights impacts and how effective it has been in addressing those impacts</p>	<p>The Company also describes how it has responded to specific human rights concerns raised by, or on behalf of, affected stakeholders</p>	<p>The company also describes how it ensures that the affected or potentially affected stakeholders and their legitimate representatives are able to access these communications.</p>	<p>Policies, SOPs, Reports, Evidence of communication (Letters, emails, etc.)</p>



Theme C

Indicator	Score 0	Score 1	Score 1.5	Score 2	Source of Verification
C1 Grievance mechanism to receive complaints or concerns from workers	The Company does not have a mechanism to raise complaints or concerns related to the Company	The company has a mechanism accessible to all employees to raise complaints or concerns related to the company	The company describes the procedure for managing the complaints or concerns from workers	The company also discloses data about the the number of grievances about human rights issues filed, addressed, or resolved.	SOPs regarding grievance mechanism, Data on human rights issues filed, addressed, and resolved.
C2 Grievance mechanism to receive complaints or concerns from external individuals and communities	The company does not have a grievance mechanism to receive complaints or concerns from external individuals and communities	The company has a grievance mechanism to receive complaints or concerns from external individuals and communities	The grievance mechanism to receive complaints or concerns from external individuals and communities is communicated to all stakeholders	The company describes the procedure for managing the complaints or concerns related to the company	SOPs, policies published on the website
C3 Users are involved in the design and performance of the grievance mechanism	The company engages with potential or actual users on the design, implementation, and performance of the grievance mechanism	The company engages with potential or actual users in designing grievance mechanism	The company engages with potential or actual users in designing and implementing of grievance mechanism	The company engages with potential or actual users in designing and implementing and performance of grievance mechanism	Documentary evidence on engaging with potential or actual users



<p>C4</p> <p>Remedying adverse impacts and incorporating lessons learned</p>	<p>The business cannot describe the approach it took or will take (if there are no adverse impacts) to provide or enable a timely remedy for victims</p>	<p>The business describes the approach it took or will take (if there are no adverse impacts) to provide or enable a timely remedy for victims</p>	<p>The business describes the approach it has taken or will take (if there are no adverse impacts) to review and change systems and procedures to prevent similar adverse impacts in the future</p>	<p>The business provides an evaluation of the effectiveness of the grievance</p>	<p>SOPs and Documents on remedying adverse impacts</p>
<p>C5</p> <p>Commitment to non-retaliation over complaints or concerns made</p>	<p>The Company prohibits retaliation against workers and other stakeholders for raising human rights-related complaints or concerns</p>	<p>The Company indicates that it prohibits retaliation against workers and other stakeholders for raising human rights-related complaints or concerns</p>	<p>NA</p>	<p>The Company also describes the measures in place to prevent retaliation (for example, guaranteeing anonymity when complaints or concerns are raised).</p>	<p>Policies, SOPs</p>

<p>C6</p> <p>Facilitates State based judicial and non-judicial mechanism</p>	<p>The Company does impede access to state-based judicial or non-judicial mechanisms or other mechanisms (such as international mechanisms) for persons who make allegations of adverse human rights impacts.</p>	<p>The Company publicly commits to not impeding access to state-based judicial or non-judicial mechanisms or other available mechanisms for persons who make allegations of adverse human rights impacts.</p>	<p>The company indicates that it does not and that it has not in any past case, require(d) affected individuals or communities participating in a grievance/ mediation process to permanently waive their legal rights to bring a claim through a judicial or non-judicial process as a condition of participating in the grievance/ mediation process.</p>	<p>The Company also sets out the process by which it will cooperate with state-based non-judicial grievance mechanism complaints brought against it AND provides an example of issues resolved (if applicable).</p>	<p>Publicly available policies, Case Reports, etc.</p>
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Theme D

Indicator	Score 0	Score 1	Score 1.5	Score 2	Source of Verification
D1 Minimum Wage	The Company does not pay minimum wage to all its employees	The company pays minimum wage to all its employees	NA	NA	Payroll reports
D2 Prohibition on Child Labour	The company uses child labour	The Company indicates that it does not use child labour and it verifies the age of job applicants and workers in its own operations to ensure that they are not engaged in child labour and abide all conditions for employment of minors stated in the Employment Act (If minors are employed)	NA	NA	Employee Records



<p>D3</p> <p>Refrain from imposing financial burdens on workers</p>	<p>The Company does not pay workers regularly, in full and on time.</p>	<p>The Company indicates that it pays workers regularly, in full and on time</p>	<p>The Company indicates that it pays pension contribution as per Maldives Pension Act</p>	<p>The company also indicates that all workers receive a pay slip with their wages explaining any legitimate deductions.</p>	<p>Payroll Records Pension payment statements</p>
<p>D4</p> <p>Refrain from restricting workers' mobility</p>	<p>The company restricts workers' mobility, including through the retention of passports, other personal identification or travel documents</p>	<p>The company does not restrict workers' mobility, including through the retention of passports, other personal identification or travel documents</p>	<p>NA</p>	<p>NA</p>	<p>Information from migrant workers.</p>
<p>D5</p> <p>Health and Safety, Living Conditions of migrant workers</p>	<p>The Company does not meet the obligations of Health and Safety measures stated in the Employment Act</p>	<p>The Company meets obligations of Health and Safety measures stated in Employment Act AND ensures adequate living conditions and food for migrant workers</p>	<p>NA</p>	<p>NA</p>	<p>Company Regulations, Evidence from Inspection, Information from migrant workers</p>

<p>D6</p> <p>Maximum Working Hours as per Employment Act</p>	<p>The Company does not abide by the Employment Act concerning maximum working hours</p>	<p>The Company abides by the Employment Act concerning maximum working hours</p>	<p>NA</p>	<p>NA</p>	<p>Company Regulations.</p>
<p>D7</p> <p>Annual Leave and Other Leaves</p>	<p>The company does not provide annual leaves and other leaves to all employees stated in the employment act</p>	<p>The company provides annual leaves and other leaves to all employees as stated in the employment act</p>	<p>NA</p>	<p>NA</p>	<p>Company Policies, Leave Records, etc.</p>

SCORING

Theme	Indicators	Points Available			Max. Score	Weightage
		1	1.5	2		
A- Governance and Policy Commitments	A1: Policy Commitment to respect human rights	Yes	NA	Yes	2	20 % <i>Score</i> 12 × 20
	A2: Commitment to engage with stakeholders on?	Yes	NA	Yes	2	
	A3: Commitment to respect Women’s rights and Gender Equality	Yes	NA	Yes	2	
	A4: Commitment to Remedy	Yes	NA	Yes	2	
	A5: Management Discussions	Yes	NA	Yes	2	
	A6: Commitment to respect the rights of human rights defenders	Yes	NA	Yes	2	
B- Embedding Respect and Human Rights Due Diligence	B1: Training on Human Rights	Yes	NA	Yes	2	30 % <i>Score</i> 12 × 30
	B2: Identifying human rights risks and impacts	Yes	Yes	Yes	2	
	B3: Assessment of risks and impacts identified	Yes	NA	Yes	2	
	B4: Implementation of human rights risks and impacts assessment findings	Yes	NA	Yes	2	
	B5: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts	Yes	NA	Yes	2	
	B6: Accounting for how human rights impacts are addressed	Yes	Yes	Yes	2	
C- Access to Remedy	C1: Grievance mechanism to receive complaints or concerns from workers	Yes	NA	Yes	2	25 %
	C2: Grievance mechanism to receive complaints or concerns from external individuals and communities	Yes	NA	Yes	2	

	C:3 Users (Staff & External parties) are involved in the design and performance of the grievance mechanism	Yes	Yes	Yes	2	$\frac{\text{Score}}{12} \times 25$
	C4: Remedying adverse impacts and incorporating lessons learned	Yes	Yes	Yes	2	
	C5: Commitment to non-retaliation over complaints or concerns made	Yes	No	Yes	2	
	C6: Facilitating State based judicial and non-judicial mechanism	Yes	Yes	Yes	2	
D- Human Rights Practices	D1: Implementation of the Minimum Wage rules	Yes	NA	NA	1	25 % $\frac{\text{Score}}{8} \times 25$
	D2: Prohibition on Child Labour	Yes	NA	NA	1	
	D3: Refrain from imposing financial burdens on workers	Yes	Yes	Yes	2	
	D4: Refrain from restricting workers' mobility	Yes	NA	NA	1	
	D5: Commitment to a high standard of Health and Safety	Yes	NA	NA	1	
	D6: Maximum Working Hours as per Employment Act	Yes	NA	NA	1	
	D7: Facilitation of Leaves	Yes	NA	NA	1	

CERTIFICATION

There will be three levels of certification based on the points scored

Human Rights Certified GOLD Level	85 – 100 points
Human Rights Certified SILVER Level	75 – 84 points
Human Rights Certified BRONZE Level	65 – 74 points