

Company Name Apple
Industry ICT (Supply Chain only)
UNGP Core Score (*) 7.0 out of 26

Score	Out of	For indicators
Governance and Policy Commitments		
0	2	A.1.1 Commitment to respect human rights
0.5	2	A.1.2 Commitment to respect the human rights of workers
0.5	2	A.1.4 Commitment to engage with stakeholders
0.5	2	A.1.5 Commitment to remedy
Embedding respect and Human Rights Due Diligence		
Embedding respect		
0.5	2	B.1.1 Embedding - Responsibility and resources for day-to-day human rights functions
Human Rights Due Diligence (HRDD)		
0.5	2	B.2.1 HRDD - Identifying: Processes and triggers for identifying human rights risks and impacts
0	2	B.2.2 HRDD - Assessing: Assessment of risks and impacts identified (salient risks and key industry risks)
1	2	B.2.3 HRDD - Integrating and Acting: Integrating assessment findings internally and taking appropriate action
0	2	B.2.4 HRDD - Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts
0	2	B.2.5 HRDD - Reporting: Accounting for how human rights impacts are addressed
Remedies and Grievance Mechanisms		
1.5	2	C.1 Grievance channels/mechanisms to receive complaints or concerns from workers
0.5	2	C.2 Grievance channels/mechanisms to receive complaints or concerns from external individuals and communities
1.5	2	C.7 Remedying adverse impacts and incorporating lessons learned
7.0	26	

(*) Instead of the full list of indicators in the 2020 CHRB Methodology, this year's assessment uses the CHRB Core UNGP Indicators. These are 13 non-industry specific indicators that focus on three key areas of the UNGPs: high level commitments, human rights due diligence and access to remedy.

The 13 indicators selected from the full CHRB Methodology are scored on a simple unweighted basis, with a maximum of 2 points for each indicator for a maximum total of 26 points.

In addition, allegations of severe human rights impacts (Measurement Theme E) were also assessed but do not impact overall final scores

Please note that the "Not met" labels in the Explanation boxes below do not necessarily mean that the company does not meet the requirements as they are described in the bullet point short text. Rather, it means that the analysts could not find information *in public sources* that met the requirements *as described in full* in the CHRB 2020 Methodology document. For example, a "Not met" under "General HRs Commitment", which is the first bullet point for indicator A.1.1, does not necessarily mean that the company does not have a general commitment to human rights. Rather, it means that the CHRB could not identify a public statement of policy in which the company commits to respecting human rights.

Detailed assessment

Governance and Policies

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1.1	Commitment to respect human rights	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: General HRs commitment: Its Code of Business Ethics does not include a commitment to respect Human Rights across its activities. In its Statement on efforts to combat Human Trafficking and Slavery in Our Business and Supply Chains , the Company states, in the context of the supplier code that it is 'committed to the highest standards of social and environmental responsibility, ethical conduct, and human rights'. It also states that 'Apple is committed to treating everyone in our business and supply chain with dignity and respect, to upholding human rights across our global network of suppliers, and to protecting the planet.' The Conflict minerals report contains a commitment to human rights in the supply chain. However, this indicator (different points of A.1.1) looks for a commitment for the Company itself. [Business Conduct Policy, 10/2015: s2.q4cdn.com & 2019 Statement on Efforts to Combat Human Trafficking and Slavery in Our Business and Supply Chains, 03/03/2020: apple.com] • Not met: UNGC principles 1 & 2 [Business Conduct Policy, 10/2015: s2.q4cdn.com] • Not met: UDHR [Business Conduct Policy, 10/2015: s2.q4cdn.com] • Not met: International Bill of Rights [Business Conduct Policy, 10/2015: s2.q4cdn.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: UNGPs: The Company states in its Conflict Mineral Report: 'Apple's Supplier Code and Responsible Sourcing Standard apply to all levels of Apple's supply chain and are based on industry and internationally accepted principles, such as the United Nations Guiding Principles on Business and Human Rights ("UN Guiding Principles"), the International Labour Organisation's International Labour Standards, and the OECD Due Diligence Guidance.' The Company also states 'Apple's Supplier Code of Conduct and Supplier Responsibility Standard on the Responsible Sourcing of Materials (Responsible Sourcing Standard) apply to all levels of Apple's supply chain and are based on industry and internationally accepted principles, such as the United Nations Guiding Principles on Business and Human Rights and the Organisation for Economic Co-operation and Development Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.' However, the statement is focused on the Supplier Code, which does not cover own operations, and 'to be based on' is not considered a commitment statement according to CHRB wording criteria. [Conflict Minerals Report 2019, 02/2020: apple.com & Supplier Responsibility 2020 Progress Report, 05/2020: apple.com] • Not met: OECD [Business Conduct Policy, 10/2015: s2.q4cdn.com & Supplier Responsibility 2020 Progress Report, 05/2020: apple.com]
A.1.2	Commitment to respect the human rights of workers	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: ILO Core: In its 2019 Statement on efforts to Combat Human Trafficking and Slavery in Our Business and Supply Chains' document, the Company states: 'Human trafficking and the use of involuntary labor are strictly prohibited in Apple's supply chain and "own" business'. It also refers to an 'Anti-Human Trafficking Policy'. However, no evidence found in these documents or others about a commitment to the ILO core, including in its Business Conduct Policy or any other policy in the public domain beyond the Supplier Code of Conduct. [Business Conduct Policy, 10/2015: s2.q4cdn.com & 2019 Statement on Efforts to Combat Human Trafficking and Slavery in Our Business and Supply Chains, 03/03/2020: apple.com] • Not met: UNGC principles 3-6 [Business Conduct Policy, 10/2015: s2.q4cdn.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Met: Explicitly list ALL four ILO for ICT suppliers: In its Supplier Code of Conduct, the Company indicates that 'Apple suppliers shall uphold the highest standards of human rights', and include provisions for each of discrimination, forced labour, child labour, freedom of association and collective bargaining. In relation with these last two, it requires that 'supplier shall freely allow workers' lawful rights to associate with others, form, and join (or refrain from joining) organizations of their choice, and bargain collectively, without interference, discrimination, retaliation, or harassment'. [Supplier Code of Conduct, 01/2019: apple.com] Score 2 • Not met: Explicit commitment to All four ILO Core: See above, no evidence found of explicit commitment to each key ILO core areas for this indicator. [Business Conduct Policy, 10/2015: s2.q4cdn.com] • Met: Respect H&S of workers: In its Code of Business Ethics, the Company states: 'Apple operates in a manner that conserves the environment and protects the safety and health of our employees. Conduct your job safely and consistently with applicable EHS requirements'. In addition, in its Environmental Health and Safety Policy Statement, it says: 'Apple Inc. is committed to protecting the environment, health and safety of our employees, customers and the global communities where we operate'. [Business Conduct Policy, 10/2015: s2.q4cdn.com & Environmental Health and Safety Policy Statement, 03/2013: images.apple.com] • Met: H&S applies to ICT suppliers: In its Supplier Code of Conduct, the Company indicates: 'Supplier shall provide and maintain a safe work environment and integrate sound health and safety management practices into its business. Workers shall have the right to refuse unsafe work and to report unhealthy working conditions.' [Supplier Code of Conduct, 01/2019: apple.com] • Not met: working hours for workers [Business Conduct Policy, 10/2015: s2.q4cdn.com] • Met: Working hours for ICT suppliers: Its Supplier Code of Conduct includes a provision with respect Working hours: 'A workweek shall be restricted to 60 hours, including overtime, and workers shall have at least one day off every seven days except in emergencies or unusual situations. Regular workweeks shall not exceed 48 hours. Supplier shall follow all applicable laws and regulations with respect to working hours and days of rest, and all overtime must be voluntary.' On the other hand the Supplier Responsibility Standard defines what emergency or unusual situation is: 'circumstances that substantially disrupt production and are out of the ordinary and out of the control of the Supplier, including earthquakes, floods, fires, national emergencies, unpredictable and prolonged loss of electrical power, and periods of prolonged political instability. Situations that can be reasonably predicted and thus planned for will not be considered either unusual or emergency situations, including peak production periods, machinery breakdowns, holidays, and seasonal fluctuations.' [Supplier Code of Conduct, 01/2019: apple.com & Supplier Responsibility Standards, 01/2019: apple.com]
A.1.4	Commitment to engage with stakeholders	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Regular stakeholder engagement: In its Conflict Mineral Report, the Company indicates: 'Apple engaged with a broad range of civil society, industry, academic, and government experts in 2019 to gather feedback on its own program. Apple also convened an expert group to discuss opportunities to work collectively on the measurement of human rights impacts and other innovative approaches to the responsible sourcing of minerals in the supply chain'. However, it is not clear whether potentially or actually affected stakeholders were engaged such as local communities, unions, suppliers' workers, etc.). No further evidence found of regular engagement with affected stakeholders. [Conflict Minerals Report 2019, 02/2020: apple.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Commits to engage stakeholders in design • Met: Regular stakeholder design engagement: The Company also indicates: 'Apple worked with key stakeholders to develop a multi-stakeholder grievance platform to foster greater transparency and consistency in how public allegations, including those potentially involving forced labor or human trafficking, are identified, reported, and addressed and to drive toward addressing potential abuses on the ground. [...] Apple also worked with the International Organization for Migration ("IOM") to provide background information and related support in connection with the development of a set of guidelines for industry actors on how to address confirmed allegations in the upstream supply chain in accordance with UN Guiding Principles. In 2018, IOM published these guidelines as the Remediation Guidelines for Victims of Exploitation in Extended Mineral Supply Chains [...]'. [Conflict Mineral Report 2018, 02/2019: apple.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1.5	Commitment to remedy	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Commits to remedy: The Company provided sources of feedback to CHRB for this indicator. However, no evidence found of a formal statement of commitment to remedy adverse impacts that it has caused or contributed to. <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Not obstructing access to other remedies • Not met: Collaborating with other remedy initiatives [Supplier Responsibility Standards, 01/2019: apple.com] • Met: Work with ICT suppliers to remedy impacts: The Company's 'Supplier Responsibility Standards' document includes requirements to remedy specific cases such of non-compliances. In addition, it states that 'If a Supplier or Apple discovers alleged or actual risks associated with its Supply Chain, Supplier shall work with Apple to respond to the applicable risks by (to the extent not prohibited by applicable law): [...] Utilizing grievance channels of recognized Third-Party organizations to report risks and request that appropriate action be taken to address identified High Risks'. In addition, the Company gives some examples of 'Recognized Third-Party Programs with Grievance Channels: 'Several, but not all, Third-Party verification or audit programs have developed grievance channels, including first or second-party channels to address alleged or confirmed High Risks with Suppliers, traders, or mines or due diligence or whistleblowing platforms (as available) established to report on and address identified risks. Examples include: ITRI's Tin Supply Chain initiative: [...]; The Responsible Jewelry Council'. In its 2018 Statement on combat human trafficking, the Company reports that it has been working in different Remediation Guidelines, such as the 'Remediation Guidelines for Victims of Exploitation in Extended Minerals Supply Chain' which states who is responsible for actions to be taken and give a step-by-step process to remedy the issue, or the 'Bonded Labor remediation program'. No new relevant evidence found in latest reports. [Supplier Responsibility Standards, 01/2019: apple.com & 2018 Statement on Efforts to Combat Human Trafficking and Slavery in Our Business and Supply Chains, 02/2019: apple.com]

Embedding Respect and Human Rights Due Diligence

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.1	Responsibility and resources for day-to-day human rights functions	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Commits to ILO core conventions: See indicator A.1.2. [Business Conduct Policy, 10/2015: s2.q4cdn.com] • Met: Senior responsibility for HR: In its website section 'Leadership', the Company discloses information about its senior management positions, including the ones related to human rights issues: 'Sabih Khan is Apple's senior vice president of Operations reporting to COO Jeff Williams. Sabih is in charge of Apple's global supply chain, ensuring product quality and overseeing planning, procurement, manufacturing, logistics and product fulfilment functions, as well as Apple's supplier responsibility programs that protect and educate workers at production facilities around the world.'; 'Deirdre O'Brien is Apple's senior vice president of Retail + People, reporting to CEO Tim Cook. [...] In her role leading the People team, Deirdre works to help Apple connect, develop and care for its employees [...]. Her teams oversee a broad range of functions including talent development and Apple University, recruiting, employee relations and experience, business partnership, benefits, compensation, and inclusion and diversity'. Therefore, the Company is reporting senior role for own operations and for supply chain. [Leadership and Governance, N/A: investor.apple.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> Met: Day-to-day responsibility: The Company indicates that: 'A number of cross-functional teams are responsible for carrying out related efforts with respect to Apple's anti-human trafficking policies, including, but not limited to, our Global Security, Business Conduct, and Supplier Responsibility ("SR") teams. The Global Security team sits within Apple's Legal and Global Security organization and seeks to identify risks across Apple and our supply chain, and mitigate them with efficient and effective security solutions. The Business Conduct team also sits within Apple's Legal and Global Security organization and sets policies and provides guidance to ensure that Apple conducts business ethically, honestly, and in full compliance with applicable laws and regulations. The SR team sits in Apple's World Wide Operations organization and coordinates activities related to our Code and our strategy to eradicate modern slavery. It works across a number of Apple business groups, teams and functions, including, but not limited to Apple's Global Security Investigations and Child Safety team, Business Conduct, Legal, Finance, Product Design, Procurement, Manufacturing Operations, and Retail.' [2019 Statement on Efforts to Combat Human Trafficking and Slavery in Our Business and Supply Chains, 03/03/2020: apple.com] Met: Day-to-day responsibility for ICT in supply chain: See above [2019 Statement on Efforts to Combat Human Trafficking and Slavery in Our Business and Supply Chains, 03/03/2020: apple.com]
B.2.1	Identifying: Processes and triggers for identifying human rights risks and impacts	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Not met: Identifying risks in own operations: In its Material Impact Profile, the Company discloses information on how it identifies, evaluates and scores risks that begin in the furthest upstream of its supply chain with the purpose of eliminating higher-risk materials from the supply chain, including human rights risks: 'For Apple, assessing only the risk to global supply was not enough. We worked with our partners to create an assessment that includes not only impacts to supply, but also environmental and social impacts throughout the global supply chain. This assessment is designed to evaluate the global landscape, not risks specific to Apple's supply chain or impacts of sourcing practices on local communities.' However, this process is not focused on the identification of human rights issues, but to eliminate high risks materials. In addition, the Company indicates in its Conflict Mineral Report: 'The RRA [Risk Readiness Assessment] was designed by Apple to help assess risks in supply chains beyond those associated with conflict, such as social, environmental, and human rights risks. In addition, Apple continued to integrate the principles of the Extractive Industries Transparency Initiative ("EITI") as part of its risk mapping and due diligence requirements. [...] In 2019, RMI announced that completion of the RRA will be an annual requirement for smelters and refiners in its Responsible Minerals Assurance Process ("RMAP") assessment program, starting in 2020. According to the Enough Project, an international human rights organization, Apple's risk assessment efforts, including sharing the RRA, contributed to the overall strengthening of conflict minerals supply chain due diligence.' In addition, in its 'Combat Human Trafficking' 2018 Statement, the Company indicates: 'Apple conducts human rights due diligence throughout the supply chain to assess potential negative human rights impacts and identify salient human rights risks, including with respect to risks of human trafficking and slavery. [...] Apple integrates human rights due diligence across all levels of our supply chain, including where minerals in our products may be sourced'. However, CHRB could not find further information describing a process to identify risks and impacts including its own operations. No new relevant evidence found in latest MSA Statement. [Material Impact Profiles, 2019: apple.com & Conflict Minerals Report 2019, 02/2020: apple.com] Met: Identifying risks in ICT suppliers: See above. <p>Score 2</p> <ul style="list-style-type: none"> Not met: Ongoing global risk identification: See above. In addition, the Company indicates: 'we funded an international expert and an organization specializing in land rights to conduct initial research for a human rights impact assessment ("HRIA") of the impact of a potential minerals traceability project on a local community in the DRC.' However, this indicator looks for specific evidence on how frequently the Company carries out the process to identify the different human rights impacts and risks that it faces. Current evidence seems to focus in one-time specific consultation. [2019 Statement on Efforts to Combat Human Trafficking and Slavery in Our Business and Supply Chains, 03/03/2020: apple.com] Not met: In consultation with stakeholders Not met: In consultation with HR experts Not met: Triggered by new circumstances

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.2	Assessing: Assessment of risks and impacts identified (salient risks and key industry risks)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Salient risk assessment (and context): In its Material Impact Profile, the Company discloses information on how it identifies, evaluates and scores risks that begin in the furthest upstream of its supply chain with the purpose of eliminating higher-risk materials from the supply chain, including human rights risks: 'For Apple, assessing only the risk to global supply was not enough. We worked with our partners to create an assessment that includes not only impacts to supply, but also environmental and social impacts throughout the global supply chain. This assessment is designed to evaluate the global landscape, not risks specific to Apple's supply chain or impacts of sourcing practices on local communities.' However, this process is not focused on the identification of human rights issues, but to eliminate high risks materials. In addition, the Company indicates in its Conflict Mineral Report: 'The RRA [Risk Readiness Assessment] was designed by Apple to help assess risks in supply chains beyond those associated with conflict, such as social, environmental, and human rights risks. In addition, Apple continued to integrate the principles of the Extractive Industries Transparency Initiative ("EITI") as part of its risk mapping and due diligence requirements. [...] In 2019, RMI announced that completion of the RRA will be an annual requirement for smelters and refiners in its Responsible Minerals Assurance Process ("RMAP") assessment program, starting in 2020. According to the Enough Project, an international human rights organization, Apple's risk assessment efforts, including sharing the RRA, contributed to the overall strengthening of conflict minerals supply chain due diligence.' In addition, in its 'Combat Human Trafficking' 2018 Statement, the Company indicates: 'Apple conducts human rights due diligence throughout the supply chain to assess potential negative human rights impacts and identify salient human rights risks, including with respect to risks of human trafficking and slavery. [...] Apple integrates human rights due diligence across all levels of our supply chain, including where minerals in our products may be sourced'. However, no information found describing the process to assess these risks and impacts, including how it takes social, geographical, economic or other factors into account beyond the context of conflict minerals. No new relevant evidence found in latest sources. [Material Impact Profiles, 2019: apple.com & Conflict Minerals Report 2019, 02/2020: apple.com] • Not met: Public disclosure of salient risks <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met
B.2.3	Integrating and Acting: Integrating assessment findings internally and taking appropriate action	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Action Plans to mitigate risks • Not met: Including in ICT supply chain • Met: Example of Actions decided: The Company discloses information about its strategy for safer materials: 'A great deal of care and research go into choosing materials for Apple products to ensure manufacturing workers, customers, and recyclers can use and handle Apple products safely. Consideration of the toxicological profile of materials is a key component of Apple's material selection process during new product development. [...] Apple believes that reducing the use of hazardous substances in materials is essential to ensure the safety of workers who manufacture its products, customers who use its products, and recyclers who handle its products at the end of the products' useful life. This commitment to the safety of workers, customers and recyclers has driven Apple to lead the electronics industry in phasing out hazardous substances from its products.' The Company has been working in this strategy during the last years with the aim of identify hazardous materials, evaluate the hazardous potential along the life of products (production, use, recycling, elimination), eliminate the use of the most dangerous materials and develop safety protocols to safe manipulation of specific materials. Part of this work are the following documents: Material Impact Profile; A Protocol for Prioritizing Chemicals of Concern in the Electronics Industry. [Integrating Toxicological Assessments in Material Selection, 09/2016: apple.com & Material Impact Profiles, 2019: apple.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.4	Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: System to check if Actions are effective: The Company provided information to CHRB in relation to this indicator, but it was not material. • Not met: Lessons learnt from checking effectiveness Score 2 <ul style="list-style-type: none"> • Not met: Both requirement under score 1 met
B.2.5	Communicating : Accounting for how human rights impacts are addressed	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Comms plan re identifying risks: See indicator B.2.1. • Not met: Comms plan re assessing risks: See indicator B.2.2. • Not met: Comms plan re action plans for risks: See indicator B.2.3. • Not met: Comms plan re reviewing action plans: See indicator B.2.4. • Not met: Including ICT suppliers Score 2 <ul style="list-style-type: none"> • Not met: Responding to affected stakeholders concerns: The Company provided information to CHRB in relation to this indicator, however, evidence was not material. • Not met: Ensuring affected stakeholders can access communications

Remedies and Grievance Mechanisms

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.1	Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers	1.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Channel accessible to all workers: In its Business Conduct Policy, the Company indicates: 'The Business Conduct Helpline is available 24/7 to all employees worldwide to help answer your questions on business conduct issues, policies, regulations, and compliance with legal requirements. It also allows you to advise Apple of situations that may require investigation or management attention.' [Business Conduct Policy, 10/2015: s2.q4cdn.com] Score 2 <ul style="list-style-type: none"> • Not met: Number grievances filed, addressed or resolved • Not met: Channel is available in all appropriate languages • Met: Expect ICT supplier to have equivalent grievance systems: In its Supplier Code of Conduct, the Company indicates: 'Supplier shall ensure that Workers have an effective mechanism to report Grievances and that facilitates open communication between management and Workers.' The Code applies to 'Apple suppliers and their subsidiaries, affiliates, and subcontractors (each a "Supplier") providing goods or services to Apple, or for use in or with Apple products'. [Supplier Code of Conduct, 01/2019: apple.com] • Met: Opens own system to ICT supplier workers: The Company's has a website section where anyone can send feedback on Supplier Responsibility, including suppliers workers. [Feedback on Supplier Responsibility Form, N/A: apple.com]
C.2	Grievance channel(s)/mechanism(s) to receive complaints or concerns from external individuals and communities	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Grievance mechanism for community: The Company indicates in its 'Conflict Mineral Report', how it collaborates in the context of minerals supply chain with whistleblowing initiatives. However, these seems to be restricted to (conflict) minerals issues. In addition in its 'Combat Human Trafficking' Statement, the Company indicates: 'Apple continued to work with the Responsible Minerals Initiative (RMI) to fund, design, and launch the Minerals Grievance Platform (mineralsgrievanceplatform.org). Through the platform, industry organizations, non-governmental organizations (NGOs), and third party audit programs collectively screen and conduct due diligence on filed grievances'. In addition, the Company's website has a section where anyone can send feedback on Supplier Responsibility. However, no evidence found in relation grievance mechanism accessible to all external individuals and communities who may be adversely impacted by the Company, not only covering specifically conflict minerals related cases or exclusively in relation to Supplier Responsibility [Conflict Minerals Report 2019, 02/2020: apple.com & 2019 Statement on Efforts to Combat Human Trafficking and Slavery in Our Business and Supply Chains, 03/03/2020: apple.com] Score 2 <ul style="list-style-type: none"> • Not met: Describes accessibility and local languages

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> Met: ICT supplier communities use global system: The Company's has a website section where anyone can send feedback on Supplier Responsibility. [Feedback on Supplier Responsibility Form, N/A: apple.com]
C.7	Remedying adverse impacts and incorporating lessons learned	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Met: Describes how remedy has been provided: In its Supplier Responsibility 2020 Progress Report, the Company indicates: 'If debt-bonded labor is found, we require remediation through the immediate return of personal identity documents and direct remedy, meaning suppliers repay the employees for any fees paid. We then verify that repayments were made in full and on time through an independent auditor.[...] \$32.3M Recruitment fees repaid by suppliers to 36,599 supplier employees since 2008. [...] \$1.3M Recruitment fees repaid to 462 supplier employees in 2019'. [Supplier Responsibility 2020 Progress Report, 05/2020: apple.com] <p>Score 2</p> <ul style="list-style-type: none"> Met: Changes introduced to stop repetition: The Company discloses information about the changes to prevent debt-bonded labor: 'In 2019 [...] we continued mapping the higher-risk migration corridors for foreign contract workers in our supply chain using our own data and information from the ILO and the U.S. State Department in order to more deeply understand challenges at the source of labor recruitment. We also convened an expert group of leading government policymakers, non-governmental organizations, and researchers to further strengthen our efforts. We also spoke directly to migrant workers and labor agents in our supply chain to better understand their experiences. [...] we strengthened our partnership with the International Organization for Migration (IOM) [...] and began to integrate labor agent audits into our responsible labor recruitment program. Consulting closely with stakeholders and the IOM, we created the Responsible Recruitment Due Diligence Toolkit ("the Toolkit").' In addition, in its 2019 Progress Report, it indicates: 'In 2018, we went further to prevent debt-bonded labor in our supply chain, and steps were taken to limit the amount of subcontracting for custodial staff in our retail stores. We also mapped the primary geographic corridors where foreign contract workers enter our supply chain and where they work. As a result, programs were put in place to strengthen debt-bonded labor prevention in high-risk regions. In 2018, we also worked closely with suppliers that hire foreign contract workers to implement stricter standards to assess the labor brokers who provide personnel to their facility. These efforts included implementing enhanced training on topics required by our Code, such as conducting worker interviews and self-assessments. This capability building effort enables suppliers to conduct more comprehensive due diligence in their labor supply chain, and to ensure no recruitment fees are charged.' [Supplier Responsibility 2019 Progress Report, 2019: apple.com & Supplier Responsibility 2020 Progress Report, 05/2020: apple.com] Not met: Evaluation of the channel/mechanism

Performance: Responses to Serious Allegations (Not included in the overall score)

Indicator Code	Indicator name	Score (out of 2)	Explanation
E(1).0	Serious allegation No 1		<ul style="list-style-type: none"> • Headline: Apple supplier investigated by China Labour Watch for unsafe and unclean conditions • Area: Health & Safety • Story: On January 16, 2018, China Labour Watch (CLW) published a report detailing poor working conditions at Catcher Technology, a supplier of metal casings to Apple. The report, which is based on undercover investigation and interviews, revealed major violations of labour rights and safety conditions. According to the CLW report, there was an incident of toxic gas poisoning in May 2017, which led to the hospitalisation of 90 workers, five of which were admitted to intensive care. The Suqian official safety supervision department subsequently issued an order to Catcher to cease manufacturing, which the Company allegedly ignored and forced workers to continue working in the affected area. Consequently, 30 other workers were hospitalised. Additionally, there were other breaches of health and safety standards identified by CLW, some of the major issues identified at Catcher's Suqian factory include; A lack of "substantial" safety training, where no information was provided to employees about the toxic chemicals they come in contact with and potential hazards. There was no eye protection for workers and additionally the gloves provided to workers manipulating cutting liquid quickly absorb the fluids, exposing workers' skin to hazardous and "severe" pollution at the factory. Furthermore the highly polluted wastewater was discharged directly into the public sewage system (levels of Chemical Oxygen Demand, Biochemical Oxygen Demand, and Suspended Solids significantly exceeded limits set by the local government). Poor hygiene was also reported at the factory cafeteria and bathrooms. CLW claims that these breaches are in violation of Apple's Supplier Responsibility Standards. • Sources: [Bloomberg - 17/01/2018: bloomberg.com][China Labor Watch - 16/01/2018: chinalaborwatch.org][The Guardian - 16/01/2018: theguardian.com]
E(1).1	The Company has responded publicly to the allegation	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Public response available: The company responds publicly to the allegations put forward in the China Labor Watch report titled 'Apple's failed CSR Audit'. [Guardian article on CLW report, 16/01/2018: theguardian.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Response goes into detail: The company responds in detail, the company disputed the claims made by CLW, saying that workers were only taken to hospital after the gas leak as a precaution. In a statement to the Guardian newspaper, a company spokesperson said, "We've been working with the team at Catcher in Suqian, China, since 2012 and they've made significant progress raising standards during that time....Dozens of Apple employees are permanently on site, monitoring operations, and we've conducted 10 in-depth audits over the past five years, including three last year – and the last audit scored 96 out of 100....When we heard these latest claims we immediately sent a team of experts to the facilities. They thoroughly investigated and interviewed over 150 workers but found no evidence that Catcher was violating our standards. Our checks also confirmed wastewater is treated appropriately and protective equipment is provided to employees who need it, with detailed records maintained...We know our work is never done, and we investigate each and every allegation that's made. We remain dedicated to doing all we can to protect the workers in our supply chain and make a positive impact on the environment." [Guardian article on CLW report, 16/01/2018: theguardian.com]
E(1).2	The Company has appropriate policies in place	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Company policies address the general issues raised: The company in its 'Environmental Health and Safety Policy Statement' says "Apple Inc. is committed to protecting the environment, health, and safety of our employees, customers and the global communities where we operate". In its 'Supplier Code of Conduct' the company says "Apple's suppliers are required to provide safe working conditions, treat workers with dignity and respect, act fairly and ethically, and use environmentally responsible practices wherever they make products or perform services for Apple". [Environmental Health and Safety Policy Statement, 03/2013: images.apple.com] • Met: Policies apply to the type of business relationships involved: The company's 'Supplier Code of Conduct' says that all suppliers are required to provide safe working conditions, the code also contains a specific area for worker health and safety which says "Supplier shall provide and maintain a safe work environment

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>and integrate sound health and safety management practices into its business". [Supplier Code of Conduct, 01/2019: apple.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Policies address the specific rights in question: In the company's 'Supplier Responsibility Progress Report 2019' it contains a section on Health and Safety Assessment results, however these results don't disclose qualitative information relating to injury rates, lost days or fatalities that occur in suppliers' factories. [Supplier Responsibility 2019 Progress Report, 2019: apple.com]
E(1).3	The Company has taken appropriate action	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Denies allegations, but has engaged affected stakeholders: In relation to the CLW report which claimed a number of workers had been exposed to toxic gas and taken to hospital, the company denied the allegations, saying "When we heard these latest claims we immediately sent a team of experts to the facilities. They thoroughly investigated and interviewed over 150 workers but found no evidence that Catcher was violating our standards". This is evidence of engagement with affected stakeholders. [Guardian article on CLW report, 16/01/2018: theguardian.com] • Not met: Denies allegations, but reviewed systems to prevent such impacts: The company says it thoroughly investigated the allegations by CLW, including that the wastewater from the factory was treated appropriately and that protective equipment was provided to all employees who require it. However there is no evidence that it has reviewed its systems in light of the gas leak caused by a mechanical failure. [Guardian article on CLW report, 16/01/2018: theguardian.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Denies allegations, but implements review recommendations: The company has not provided any evidence that it has conducted a review into the gas leak, aside from conducting interviews with workers, nor has it provided any evidence of implementing the recommendations arising from a review. [Guardian article on CLW report, 16/01/2018: theguardian.com] • Not met: Denies allegations, and ensures systems prevent such impacts: The company has not provided any evidence describing how it has ensured the current management systems in place will prevent an impact, such as mechanical faults causing a gas leak, from happening in the future. [Guardian article on CLW report, 16/01/2018: theguardian.com]
E(2).0	Serious allegation No 2		<ul style="list-style-type: none"> • Headline: China Labor Watch's report reveals several violations of labour rights in Apple's Supplier chain • Area: Excessive overtime • Story: On November 21, 2017, press sources reported that Apple relies on students working illegal overtime to build its iPhone X, through its contractor Foxconn, which is the sole assembler and manufacturer of this iPhone model in China. <p>On May 3rd, 2017, the US-based NGO, China Labor Watch (CLW), released a report on working conditions of Apple's four large suppliers (Foxconn, Pegatron, Compel, and Green Point). The report which is based on undercover investigations and interviews, revealed violations of labour rights within regular employees and students who worked in the supplier plants in China. Working hours surpassed 60 hours and monthly overtime hours surpassed 90 hours and workers were required to sign an agreement to voluntarily do overtime.</p> <p>CLW published a report in August 2016 alleging that Apple's iPhone 7 are assembled at a Pegatron factory where workers exceed 60 hours of working hours per week. In addition, it is claimed that those workers have poor housing and living conditions in the dorm near the factory.</p> <p>CLW also claimed in 2015 that a worker died while employed at Shanghai Pegatron making Apple iPhone 6, after working up to 12 hours a day, seven days a week according to his family.</p> <p>It was reported previously that workers in Foxconn's Longhua plant which manufactures Apple products overworked and underpaid and on occasions subject to humiliation from managers for their mistakes, resulting in 18 reported suicide attempts at the factory in 2010 and 14 confirmed deaths in the same year.</p> <ul style="list-style-type: none"> • Sources: [China Labor Watch, 11/03/2015: chinalaborwatch.org][The Guardian, 21/11/2017: theguardian.com][China Labor Watch, 03/05/2017: chinalaborwatch.org][China Labor Watch, 24/08/2016: chinalaborwatch.org]

Indicator Code	Indicator name	Score (out of 2)	Explanation
E(2).1	The Company has responded publicly to the allegation	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Public response available: As for iPhone 7 production, the Company's supplier Pegatron stated that the working conditions "are not acceptable, do not comply with the code of conduct that we diligently follow, and do not reflect current conditions of our existing dormitories". However, Apple has not published comments regarding the case. [Guardian article on CLW report, 16/01/2018: theguardian.com & The Guardian article on forced excessive overtime in China, 11/2017: theguardian.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Response goes into detail: See above.
E(2).2	The Company has appropriate policies in place	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Company policies address the general issues raised: The Company states that "A workweek shall be restricted to 60 hours, including overtime, and workers shall take at least one day off every seven days except in emergencies or unusual situations. Regular work week shall not exceed 48 hours.", which is the limit stipulated by ILO. [Supplier Code of Conduct, 01/2019: apple.com] • Met: Policies apply to the type of business relationships involved: The policy also applies to the Company's supplier. [Supplier Code of Conduct, 01/2019: apple.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Policies address the specific rights in question: The Company states that "A workweek shall be restricted to 60 hours, including overtime, and workers shall take at least one day off every seven days except in emergencies or unusual situations. Regular work week shall not exceed 48 hours.", which is the limit stipulated by ILO. [Supplier Code of Conduct, 01/2019: apple.com]
E(2).3	The Company has taken appropriate action	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Engages with affected stakeholders: CHRB did not find the evidence of the Company's engagement with affected stakeholders. • Not met: Encourages linked business to engage affected stakeholders: CHRB could not find the evidence of the Company's encouraging its business partners to engage with the affected stakeholders. • Not met: Provides remedies to affected stakeholders: CHRB did not find evidence of the Company providing remedies. • Not met: Has reviewed management systems to prevent recurrence: Regarding iPhone X production, the Company states that "A team of specialists are on site at the facility working with the management on systems to ensure the appropriate standards are adhered to." However, it is not clear if the Company has reviewed all of its manufacturing sites. [The Guardian article on forced excessive overtime in China, 11/2017: theguardian.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Remedies are satisfactory to the victims • Not met: Has improved systems and engaged affected stakeholders: CHRB did not find evidence of the Company's improving the system or engaging with stakeholders followed by the case.
E(3).0	Serious allegation No 3		<ul style="list-style-type: none"> • Headline: Apple accused of being complicit in child labour in the DRC • Area: Child labour • Story: On December 15th, 2019, a legal complaint was filed in the U.S. District Court of Washington D.C. by human rights NPO International Rights Advocates, on behalf of 14 families from the Democratic Republic of Congo (DRC), against Tesla, Microsoft, Alphabet, Dell and Apple. The lawsuit accuses the companies of aiding and abetting in the death and serious injury of children who were reportedly working in cobalt mines operated by Kamoto Copper Company, owned by Glencore. <p>The complaint alleges that the defendants have known for a "significant period of time" that Congo's mining sector "is dependent upon children". The claim further alleged that cobalt from the Glencore-owned mines was then sold to Umicore, which in turn sells battery-grade cobalt to Apple, Google, Tesla, Microsoft and Dell. These companies, according to the complaint, should have the ability to overhaul their cobalt supply chains to ensure safer working conditions.</p> <p>The lawsuit alleges that the children, some as young as 6 years old, were forced by their families' extreme poverty to leave school and work in cobalt mines owned by Glencore. According to the complaint, six of the fourteen children were killed in tunnel collapses, while others suffered life-altering injuries, including paralysis.</p>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Some children were working six days a week and allegedly paid as little as USD 1.50 per day.</p> <ul style="list-style-type: none"> Sources: [CBS News - 17/12/2019: cbsnews.com][Sky News - 17/12/2019: news.sky.com][Daily Maverick - 17/12/2019: dailymaverick.co.za][Reuters - 16/12/2019: reuters.com]
E(3).1	The Company has responded publicly to the allegation	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Met: Public response available: 'Apple told CBS News the company has "led the industry by establishing the strictest standards for our suppliers and are constantly working to raise the bar for ourselves, and the industry." The company added that since 2016, it has published a full list of cobalt refiners every year, all of which participate in third-party audits. "If a refiner is unable or unwilling to meet our standards, they will be removed from our supply chain," Apple said, adding that it removed six cobalt refiners in 2019.' [Apple, Google, Microsoft, Tesla and Dell sued over child-mined cobalt from Africa, 17/12/2019: cbsnews.com] <p>Score 2</p> <ul style="list-style-type: none"> Not met: Response goes into detail
E(3).2	The Company has appropriate policies in place	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Met: Company policies address the general issues raised: In its 2019 Statement on Efforts to Combat Human Trafficking and Slavery in Our Business and Supply Chains, the Company mentions its dedication to protecting children 'wherever our products are made or used.' [2019 Statement on Efforts to Combat Human Trafficking and Slavery in Our Business and Supply Chains, 03/03/2020: apple.com] Met: Policies apply to the type of business relationships involved: The above also includes the supply chain. [2019 Statement on Efforts to Combat Human Trafficking and Slavery in Our Business and Supply Chains, 03/03/2020: apple.com] <p>Score 2</p> <ul style="list-style-type: none"> Met: Policies address the specific rights in question: The Supplier Responsibility Standards includes specific mechanisms to protect the rights of children in the supply chain. [Supplier Responsibility Standards, 01/2019: apple.com]
E(3).3	The Company has taken appropriate action	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Not met: Engages with affected stakeholders: There is no evidence that Apple engaged with affected stakeholders Not met: Provides remedies to affected stakeholders Not met: Has reviewed management systems to prevent recurrence: Although the Company indicates it has removed refiners for being unable to meet its standards, no evidence of a review of management systems following the allegation could be found. [Apple, Google, Microsoft, Tesla and Dell sued over child-mined cobalt from Africa, 17/12/2019: cbsnews.com] <p>Score 2</p> <ul style="list-style-type: none"> Not met: Remedies are satisfactory to the victims Not met: Has improved systems and engaged affected stakeholders
E(4).0	Serious allegation No 4		<ul style="list-style-type: none"> Headline: Apple and others named as supplier North Mara Gold Mine faces allegations of pollution and violence in Tanzania Area: Right to security Story: On June 18th, 2019, news outlets in several countries simultaneously released the results of investigations by a consortium of journalists, Forbidden Stories, into human rights and environmental abuses at Barrick Gold's North Mara gold mine in Tanzania, confirming six years of investigations, reported on yearly by MiningWatch Canada, into assaults on men, women and children by the mine's private security and by police contracted by the mine. There have been injury cases including loss of limbs, loss of sight, broken bones, and internal injuries. Additionally, the consortium highlighted attacks on journalists who have tried to report on human rights abuses at the mine. At least a dozen local and foreign reporters were censored or threatened, and this is why Forbidden Stories has decided to investigate Acacia Mining's activity in the mine. The consortium also exposed how the gold from this mine is refined in India and Switzerland before being sold to, among others, international electronic companies. In June 2019, at the annual shareholders meeting, human rights campaigners called for independent and transparent assessment of grievance claims and an end to the memorandum of understanding with police." Sources: [The Guardian - 18/06/2019: theguardian.com][The Guardian - 18/06/2019: theguardian.com][Ghana Business News - 19/06/2019: ghanabusinessnews.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
E(4).1	The Company has responded publicly to the allegation	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: Public response available: The Company responded to the press for comment, mentioning existing policies. However, no acknowledgement of the allegation could be found. [Tech firms to check suppliers after mining revelations in Tanzania, 18/06/2019: theguardian.com] Score 2 <ul style="list-style-type: none"> Not met: Response goes into detail
E(4).2	The Company has appropriate policies in place	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: Company policies address the general issues raised: No policies relating to human rights security could be found. Not met: Policies apply to the type of business relationships involved Score 2 <ul style="list-style-type: none"> Not met: Policies address the specific rights in question
E(4).3	The Company has taken appropriate action	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: Engages with affected stakeholders Not met: Provides remedies to affected stakeholders Not met: Has reviewed management systems to prevent recurrence Score 2 <ul style="list-style-type: none"> Not met: Remedies are satisfactory to the victims Not met: Has improved systems and engaged affected stakeholders

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 the required information in public documentation.

See the 2020 Key Findings report and the 2019 technical annex for more details of the research process.

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As WBA, 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, 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.

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