

**Company Name** Broadcom  
**Industry** ICT (Own operations and Supply Chain)  
**UNGP Core Score (\*)** 2.5 out of 26

Score	Out of	For indicators
<b>Governance and Policy Commitments</b>		
1	2	A.1.1 Commitment to respect human rights
0.5	2	A.1.2 Commitment to respect the human rights of workers
0	2	A.1.4 Commitment to engage with stakeholders
0	2	A.1.5 Commitment to remedy
<b>Embedding respect and Human Rights Due Diligence</b>		
Embedding respect		
0	2	B.1.1 Embedding - Responsibility and resources for day-to-day human rights functions
Human Rights Due Diligence (HRDD)		
0	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)
0	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
<b>Remedies and Grievance Mechanisms</b>		
1	2	C.1 Grievance channels/mechanisms to receive complaints or concerns from workers
0	2	C.2 Grievance channels/mechanisms to receive complaints or concerns from external individuals and communities
0	2	C.7 Remedying adverse impacts and incorporating lessons learned
2.5	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	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"> <li>• Met: General HRs commitment: The Company explicitly commits to respecting human rights. "Broadcom is committed to respecting human rights and avoiding complicity in any human rights abuse throughout the Company, our operations, our supply chain and our communities." [Code of Ethics and Business Conduct, 13/03/2019: <a href="https://investors.broadcom.com">investors.broadcom.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: UNGPs</li> <li>• Not met: OECD</li> </ul>
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"> <li>• Not met: ILO Core: The Company failed to commit to respect the right to bargain freely and not to use child labour. [Code of Ethics and Business Conduct, 13/03/2019: <a href="https://investors.broadcom.com">investors.broadcom.com</a>]</li> <li>• Not met: UNGC principles 3-6: Symantec's (acquired by Broadcom) human rights policy states: 'We are a signatory to the United Nations Global Compact (UNGC) and its Lead Program'. However, no evidence found of Broadcom being a UNGC signatory. Previous evidence was no longer found in public domain. [Human Rights Policy, 01/2014: <a href="https://docs.broadcom.com">docs.broadcom.com</a> &amp; Citizenship, N/A: <a href="https://broadcom.com">broadcom.com</a>]</li> <li>• Not met: Explicitly list ALL four ILO for ICT suppliers: The Company failed to list each of the four core ILO principles in its Supplier Environmental and Social Responsibility Code of Conduct as it did not mention the commitment to non discrimination. "Supplier shall not employ under-age labor as described in Minimum Age Convention 138 and Worst Forms of Child Labour Convention 182 of the International Labour Organization. Supplier shall not make use of forced or compulsory labor as described in Article 2 in the Forced Labour Convention 29 and Article 1"; "Supplier shall respect, within the framework of local laws and established practices, the principles of Article 2 in the Freedom of Association and Protection of the Right to Organize Convention 87 and Articles 1 and 2 in the Right to Organize and Collective Bargaining Convention 98 of the International Labour Organization." [Supplier Environmental and Social Responsibility Code of Conduct, 23/04/2018: <a href="https://docs.broadcom.com">docs.broadcom.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Explicit commitment to All four ILO Core [Citizenship, N/A: <a href="https://broadcom.com">broadcom.com</a>]</li> <li>• Met: Respect H&amp;S of workers: The Company is committed to managing and operating its assets in a manner that is protective of human health and safety and the environment. [Code of Ethics and Business Conduct, 13/03/2019: <a href="https://investors.broadcom.com">investors.broadcom.com</a>]</li> <li>• Not met: H&amp;S applies to ICT suppliers: The Company's statement about worker's human rights does not convey a strong enough commitment. "Suppliers shall comply with all applicable environmental, health and safety laws, rules and regulations." [Supplier Environmental and Social Responsibility Code of Conduct, 23/04/2018: <a href="https://docs.broadcom.com">docs.broadcom.com</a>]</li> <li>• Not met: working hours for workers: The Company's statement does not convey a strong commitment to respecting working hours for workers, as the Company only states its compliance to local law. "We comply with applicable labor laws, including wage and hour laws, and we expect our business partners to do the same." [Supplier Environmental and Social Responsibility Code of Conduct, 23/04/2018: <a href="https://docs.broadcom.com">docs.broadcom.com</a>]</li> <li>• Not met: Working hours for ICT suppliers</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1.4	Commitment to engage with stakeholders	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"> <li>Not met: Commits to stakeholder engagement: The Company states: 'Broadcom is committed to conducting its business in an ethical, socially responsible and environmentally sustainable manner that contributes to growth and innovation and delivers economic, social and environmental benefits for all stakeholders'. However, no evidence found of a formal commitment to stakeholder engagement. [Citizenship, N/A: <a href="https://www.broadcom.com">broadcom.com</a>]</li> <li>Not met: Regular stakeholder engagement</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>Not met: Commits to engage stakeholders in design</li> <li>Not met: Regular stakeholder design engagement</li> </ul>
A.1.5	Commitment to remedy	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"> <li>Not met: Commits to remedy</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>Not met: Not obstructing access to other remedies</li> <li>Not met: Collaborating with other remedy initiatives</li> <li>Not met: Work with ICT suppliers to remedy impacts</li> </ul>

## 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	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>Not met: Commits to ILO core conventions: See indicator A.1.2 [Code of Ethics and Business Conduct, 13/03/2019: <a href="https://investors.broadcom.com">investors.broadcom.com</a>]</li> <li>Not met: Senior responsibility for HR</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>Not met: Day-to-day responsibility</li> <li>Not met: Day-to-day responsibility for ICT in supply chain</li> </ul>
B.2.1	Identifying: Processes and triggers for identifying human rights risks and impacts	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"> <li>Not met: Identifying risks in own operations</li> <li>Not met: Identifying risks in ICT suppliers</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>Not met: Ongoing global risk identification</li> <li>Not met: In consultation with stakeholders</li> <li>Not met: In consultation with HR experts</li> <li>Not met: Triggered by new circumstances</li> </ul>
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"> <li>Not met: Salient risk assessment (and context)</li> <li>Not met: Public disclosure of salient risks</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>Not met: Both requirements under score 1 met</li> </ul>
B.2.3	Integrating and Acting: Integrating assessment findings internally and taking 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"> <li>Not met: Action Plans to mitigate risks</li> <li>Not met: Including in ICT supply chain</li> <li>Not met: Example of Actions decided</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>Not met: Both requirements under score 1 met</li> </ul>

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"> <li>• Not met: System to check if Actions are effective</li> <li>• Not met: Lessons learnt from checking effectiveness</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Both requirement under score 1 met</li> </ul>
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"> <li>• Not met: Comms plan re identifying risks</li> <li>• Not met: Comms plan re assessing risks</li> <li>• Not met: Comms plan re action plans for risks</li> <li>• Not met: Comms plan re reviewing action plans</li> <li>• Not met: Including ICT suppliers</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Responding to affected stakeholders concerns</li> <li>• Not met: Ensuring affected stakeholders can access communications</li> </ul>

## 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	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Met: Channel accessible to all workers: The Company discloses the Broadcom Compliance Hotline, hosted by Navex EthicsPoint, a third-party vendor retained by Broadcom to provide secure and independent reporting capability 24 hours a day. In addition, it states: 'Each Company employee is encouraged to promptly report a good faith complaint regarding Company accounting, internal accounting controls or auditing matters ("Accounting Matters"), as well as any suspected illegal acts or violations of Company policies by the Company, its employees or its agents ("Legal Allegations"), in accordance with the provisions of this policy'. [Open Door Policy, 04/2018: <a href="https://investors.broadcom.com">investors.broadcom.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Number grievances filed, addressed or resolved</li> <li>• Not met: Channel is available in all appropriate languages: No evidence found of the Company's Compliance Hotline being available in all appropriate languages. [Compliance Hotline, N/A: <a href="https://investors.broadcom.com">investors.broadcom.com</a> &amp; Ethics Point, N/A: <a href="https://secure.ethicspoint.com">secure.ethicspoint.com</a>]</li> <li>• Not met: Expect ICT supplier to have equivalent grievance systems</li> <li>• Not met: Opens own system to ICT supplier workers</li> </ul>
C.2	Grievance channel(s)/mechanism(s) to receive complaints or concerns from external individuals and communities	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Grievance mechanism for community: The Company does not explicitly state whether its grievance channel is available for communities. "Broadcom maintains a Compliance Hotline, hosted by EthicsPoint (a third party vendor), that is available to those who wish to ask questions about Broadcom policy, seek guidance on specific situations or report violations of the Code." [Compliance Hotline, N/A: <a href="https://investors.broadcom.com">investors.broadcom.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Describes accessibility and local languages</li> <li>• Not met: Expects ICT supplier to have community grievance systems</li> <li>• Not met: ICT supplier communities use global system</li> </ul>
C.7	Remedying adverse impacts and incorporating lessons learned	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Describes how remedy has been provided</li> <li>• Not met: Says how it would remedy key sector risks</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Changes introduced to stop repetition</li> <li>• Not met: Approach to learning from incident to prevent future impacts</li> <li>• Not met: Evaluation of the channel/mechanism</li> </ul>

## 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		No allegations meeting the CHRB severity threshold were found.

### 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.

The Benchmark is made available on the express understanding that it will be used solely for general information purposes. The material contained in the Benchmark should not be construed as relating to accounting, legal, regulatory, tax, research or investment advice and it is not intended to take into account any specific or general investment objectives. The material contained in the Benchmark does not constitute a recommendation to take any action or to buy or sell or otherwise deal with anything or anyone identified or contemplated in the Benchmark. Before acting on anything contained in this material, you should consider whether it is suitable to your particular circumstances and, if necessary, seek professional advice.

The CHRB is part of the World Benchmarking Alliance ('WBA'). The material in the Benchmark has been put together solely according to the CHRB methodology and not any other assessment models in operation within any of the project partners or EIRIS Foundation as provider of the analyst team.

No representation or warranty is given that the material in the Benchmark is accurate, complete or up-to-date. The material in the Benchmark is based on information that we consider correct and any statements, opinions, conclusions or recommendations contained therein are honestly and reasonably held or made at the time of publication. Any opinions expressed are our current opinions as of the date of the publication of the Benchmark only and may change without notice. Any views expressed in the Benchmark only represent the views of WBA, unless otherwise expressly noted.

While the material contained in the Benchmark has been prepared in good faith, neither WBA nor any of its agents, representatives, advisers, affiliates, directors, officers or employees accept any responsibility for or make any representation or warranty (either express or implied) as to the truth, accuracy, reliability or completeness of the information contained in this Benchmark or any other information made available in connection with the Benchmark. Neither WBA nor any of its agents, representatives, advisers, affiliates, directors, officers and employees undertake any obligation to provide the users of the Benchmark with additional information or to update the information contained therein or to correct any inaccuracies which may become apparent (save as to the extent set out in CHRB appeals procedure). To the maximum extent permitted by law any responsibility or liability for the Benchmark or any related material is expressly disclaimed provided that nothing in this disclaimer shall exclude any liability for, or any remedy in respect of, fraud or fraudulent misrepresentation. Any disputes, claims or proceedings this in connection with or arising in relation to this Benchmark will be governed by and construed in accordance with Dutch law and shall be subject to the exclusive jurisdiction of the Courts of Amsterdam.

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.

#### COPYRIGHT

Our publications and benchmarks are the product of the World Benchmarking Alliance. Our work is licensed under the Creative Commons Attribution-Non Commercial-No Derivatives 4.0 International License. To view a copy of this license, visit [creativecommons.org](https://creativecommons.org)