

Company Name Micron Technology
Industry ICT (Own operations and Supply Chain)
UNGP Core Score (*) 6.5 out of 26

Score	Out of	For indicators
Governance and Policy Commitments		
1	2	A.1.1 Commitment to respect human rights
0.5	2	A.1.2 Commitment to respect the human rights of workers
1	2	A.1.4 Commitment to engage with stakeholders
0	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	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)
0.5	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
1.5	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
6.5	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"> • Met: General HRs commitment: The Company states 'We are strongly committed to respecting and protecting human rights wherever we operate.' [Code of Business Conduct and Ethics, 8/2018: micron.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: UNGPs • Not met: OECD
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: The Company's Human Rights Policy covers child labor, non-discrimination, and forced labour. In relation to freedom of association and collective bargaining, the Company states the following: 'Micron respects the rights of workers to form and join trade unions of their own choosing, to bargain collectively and to peacefully assemble as permitted under applicable local law'. However, no details found on alternatives for those countries where there are legal restrictions to the exercise of these rights. [Human Rights Policy, 2019: micron.com] • Not met: UNGC principles 3-6 • Not met: Explicitly list ALL four ILO for ICT suppliers: The Human Rights Policy applies to suppliers: 'To protect human rights beyond our direct operations, Micron further requires our suppliers and contractors to adopt the same or similar standards.' However, as indicated above, it is not clear if the Company commits to develop alternative mechanisms for locations where there are legal restrictions in relation to freedom of association and collective bargaining. [Human Rights Policy, 2019: micron.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Explicit commitment to All four ILO Core: See above. [Human Rights Policy, 2019: micron.com] • Met: Respect H&S of workers: The Company is 'committed to providing all team members with a safe work environment.' It meets 'the RBA's standards for occupational safety, emergency preparedness, occupational injury and illness, industrial hygiene, physically demanding work, machine safeguarding, sanitation, food, housing and health and safety communication.' [Code of Business Conduct and Ethics, 8/2018: micron.com] • Met: H&S applies to ICT suppliers: The Company states the following: 'When it comes to safety, we hold our vendors, suppliers and contractors to the same high standard to which we hold ourselves.' [Code of Business Conduct and Ethics, 8/2018: micron.com] • Not met: working hours for workers: The Company states the following: 'we follow all applicable laws relating to working hours and wages, as well as all RBA Code of Conduct guidelines. Under these guidelines, work weeks must not exceed the maximum set by local law and, generally, should not be more than 60 hours per week, including overtime. In addition, all workers are allowed at least one day off every seven days.' However, no evidence found of references to standard weekly hours or the Company explicitly committing to respect ILO conventions on working hours. Similar evidence found in Human Rights policy. [Code of Business Conduct and Ethics, 8/2018: micron.com & Human Rights Policy, 2019: micron.com] • Not met: Working hours for ICT suppliers: The above also applies to suppliers. [Code of Business Conduct and Ethics, 8/2018: micron.com]
A.1.4	Commitment to engage with stakeholders	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: Regular stakeholder engagement: The Company discloses the following: 'Throughout our global operations we engage with both internal and external

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>stakeholders, including: team members, customers, governmental organizations and representatives, shareholders, community and suppliers'. 'This outreach occurs at the both the local, subsidiary and corporate levels through a number of organizations to understand and address the nexus between our impacts and contributions to our communities and our obligations under local laws.' The Company discloses engagement carried out in its sustainability report, for each of these groups. For communities, for instance, states that 'engaging in supporting STEM education, engaging in local, regional, and national public policy dialogues, etc.' For employees, it included team member meetings (senior leaders host these meeting to inform and encourage team members to bring forward issues and questions), intranet used as social media platform for employees to post thoughts, opinions, questions and suggestions, etc. [2018 Sustainability Report, 1/4/2018: micron.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Commits to engage stakeholders in design • Not met: Regular stakeholder design engagement
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"> • Not met: Commits to remedy <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 • Not met: Work with ICT suppliers to remedy impacts

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 • Met: Senior responsibility for HR: The Company has 'A Chief Compliance Officer responsible for compliance and ethics issues at Micron, a position currently held by Joel Poppen, Vice President of Legal Affairs, General Counsel, and Corporate Secretary.' This is the Executive sponsor for the Human Rights policy. [Compliance and Ethics Program, 24/4/2019: micron.com & Human Rights Policy, 2019: micron.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Day-to-day responsibility: 'The Steering Team met at least monthly during the year ended December 31, 2017 to review progress towards maintaining our goal of a responsibly-sourced supply chain. Oversight of the Conflict Minerals Steering Team was provided by a cross-functional Conflict Minerals Executive Team comprised of Vice President-level executives, which is charged with sponsoring and reviewing our conflict minerals program, and a newly-established Global Supply Chain Compliance Council, which is comprised of a subset of our Conflict Minerals Executive Team and charged with direct oversight of our responsible sourcing program. During the year ended December 31, 2017, the Global Supply Chain Compliance Council reported to the Conflict Minerals Executive Team on a monthly basis to review our progress towards our goal of achieving a responsibly-sourced supply chain.' However, no evidence found on how day-to-day responsibility is allocated for managing human rights issues beyond conflict minerals, company-wide. [Conflict minerals report, 2018: investors.micron.com] • Not met: Day-to-day responsibility for ICT in supply chain: See above. [Conflict minerals report, 2018: investors.micron.com]
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"> • Not met: Identifying risks in own operations • Not met: Identifying risks in ICT suppliers: The Company states: 'We monitor and address myriad potential supply chain risks, from natural disasters to financial vulnerability to human rights infractions'. However, no evidence of a description of the process to identify the human rights risks. [2019 Sustainability report, 2019: micron.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Ongoing global risk identification • 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): The Company describes the following: 'At Micron we regularly assess risks, including human-rights-related risks, and we regularly review our policies to ensure we are appropriately addressing these risks. [...] We regularly conduct due diligence and audits across our supply chain to assess supplier compliance with these and other requirements.' The Company describes its process to assess risks from its different suppliers (assesses suppliers, gives them a score, audits and carries out plans). However, it is not clear the process it follows to assess the different human rights it faces as a Company. Evidence seems to focus in determining suppliers' specific risks and compliance, as the Company also reports evidence of audits. [Human Rights Policy, 2019: micron.com & 2019 Sustainability report, 2019: micron.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	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: Action Plans to mitigate risks: In order to mitigate risks, the Company updates its policies following the risk assessment. 'At Micron we regularly assess risks, including human-rights-related risks, and we regularly review our policies to ensure we are appropriately addressing these risks. With board oversight and through several senior and executive level councils and committees, we seek relevant guidance from stakeholders and subject matter experts and perform appropriate assessments and adopt and implement policies we deem needed.' [Human Rights Policy, 2019: micron.com] • Not met: Including in ICT supply chain: Although the Company provides evidence of supply chain monitoring, this indicator looks for evidence of general action plans carried out to prevent and mitigate human right salient issues of its supply chain. Evidence found focuses in due-diligence audits for monitoring compliance with policies. [2019 Sustainability report, 2019: micron.com] • Not met: Example of Actions decided: The Company indicates that it is implementing 'Responsible Business Alliance's guidelines on working hours, which state that employees in all functions should work no more than 60 hours per week, with one day off every six days. We are also expanding offerings to support employee mental health'. However, this indicator looks for evidence of action plans taken as a response to human rights salient issues identified. The Company describes these actions, however, it is not clear if it is made in the context of an improvement action plan due to an assessed salient issue. [2019 Sustainability report, 2019: micron.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met
B.2.4	Tracking: Monitoring and evaluating the effectiveness of actions to respond to 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"> • Not met: System to check if Actions are effective: The Company provided evidence of monitoring its Human Rights commitments, however, no description of a system to monitor actions taken could be found. • Not met: Lessons learnt from checking effectiveness <p>Score 2</p> <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	<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: Comms plan re identifying risks • Not met: Comms plan re assessing risks • Not met: Comms plan re action plans for risks • Not met: Comms plan re reviewing action plans • Not met: Including ICT suppliers <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Responding to affected stakeholders concerns • 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	<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: Channel accessible to all workers: Questions or concerns are directed to the department manager. If the complainant is not comfortable doing so, the alternative is the Compliance Hotline. The Company's Compliance Hotline is 'an ethics and compliance reporting service provided by the Company that permits anyone—employees, customers, vendors, agents, suppliers or members of the general public—to ask questions, report concerns, or follow up on matters on which they have already reported.' [EthicsPoint FAQ, 24/4/2019: secure.ethicspoint.com & Code of Business Conduct and Ethics, 8/2018: micron.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Number grievances filed, addressed or resolved • Met: Channel is available in all appropriate languages: The Company 'has established toll-free numbers in every country in which the Company has facilities. Multilingual operators are available so that callers can make reports or ask questions in their native tongue.' [EthicsPoint FAQ, 24/4/2019: secure.ethicspoint.com] • Not met: Expect ICT supplier to have equivalent grievance systems • Met: Opens own system to ICT supplier workers: As stated above, the mechanism is available to suppliers. [EthicsPoint FAQ, 24/4/2019: secure.ethicspoint.com]
C.2	Grievance channel(s)/mechanism(s) to receive complaints or concerns from external individuals and communities	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: Grievance mechanism for community: As stated in C.1, the Compliance Hotline is available to members of the general public. [EthicsPoint FAQ, 24/4/2019: secure.ethicspoint.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Describes accessibility and local languages: As stated previously, the channel is available in all relevant languages where the Company operates. 'The Compliance Hotline has two methods of intake. The first is by toll-free telephone number, which is staffed 24 hours a day, seven days a week, every day of the year. When you call, a professionally trained EthicsPoint intake specialist will guide you through a series of questions designed to identify the relevant details of your report or question. [...] The second option is to use the web intake portal system. This intake portal is available anywhere that you have access to the Internet. The intake portal asks you for the same types of relevant details about your question or concern as the telephone-based system. Again, you may choose to remain anonymous, and EthicsPoint will make no attempt to track your web address or otherwise identify you.' [EthicsPoint FAQ, 24/4/2019: secure.ethicspoint.com] • Not met: Expects ICT supplier to have community grievance systems • Not met: ICT supplier communities use global system
C.7	Remedying adverse impacts and incorporating lessons learned	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: Describes how remedy has been provided • Not met: Says how it would remedy key sector risks <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Changes introduced to stop repetition • Not met: Approach to learning from incident to prevent future impacts • 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		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.

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