

Company Name Apple Inc
Industry ICT (Supply Chain only)
Overall Score (*) 35.6 out of 100

Theme Score	Out of	For Theme
0.9	10	A. Governance and Policies
6.0	25	B. Embedding Respect and Human Rights Due Diligence
5.8	15	C. Remedies and Grievance Mechanisms
7.2	20	D. Performance: Company Human Rights Practices
10.8	20	E. Performance: Responses to Serious Allegations
4.7	10	F. Transparency

(*) Please note that any small differences between the Overall Score and the added total of Measurement Theme scores are due to rounding the numbers at different stages of the score calculation process.

Please note also 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 2019 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

A. Governance and Policies (10% of Total)

A.1 Policy Commitments (5% of Total)

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: 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, 'We are 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: s22.q4cdn.com & 2018 Statement on Efforts to Combat Human Trafficking and Slavery in Our Business and Supply Chains, 02/2019: apple.com] Not met: UNGC principles 1 & 2 [Business Conduct Policy, 10/2015: s22.q4cdn.com] Not met: UDHR [Business Conduct Policy, 10/2015: s22.q4cdn.com] Not met: International Bill of Rights [Business Conduct Policy, 10/2015: s22.q4cdn.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> Not met: UNGPs: The Company states in its Conflict Mineral Report 2018: '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 Organization's International Labour Standards, and the OECD Due Diligence Guidance.' 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 methodology. [Conflict Mineral Report 2018, 02/2019: apple.com] Not met: OECD [Business Conduct Policy, 10/2015: s22.q4cdn.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: Although in its 2018 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'. In its 'Combat Human Trafficking' 2018 Statement, the Company speaks about a 'Anti-Human Trafficking Policy' and a Business Conduct & Global Compliance program. However, no evidence found in these documents or others any reference of 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: s22.q4cdn.com & 2018 Statement on Efforts to Combat Human Trafficking and Slavery in Our Business and Supply Chains, 02/2019: apple.com] Not met: UNGC principles 3-6 [Business Conduct Policy, 10/2015: s22.q4cdn.com] 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] <p>Score 2</p> <ul style="list-style-type: none"> 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: s22.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: s22.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: s22.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]

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1.3.ICT.a	Commitment to responsible sourcing of minerals	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: Responsible mineral sourcing in conflict areas: The Company indicates: 'Through its strict supplier standards, Apple commits to use minerals in its products that do not directly or indirectly finance armed conflict or benefit armed groups.[...] Apple is committed to going beyond the minimum requirements in order to meet and exceed internationally accepted due diligence standards and protect people in its supply chain, with the ultimate goal of improving conditions on the ground in the Democratic Republic of the Congo ("DRC") and adjoining countries.[...] Apple's human rights and responsible sourcing program includes due diligence on the source and chain of custody of 3TG in its global supply chain (see Annex I). It has been designed to conform in all material respects to the five-step framework of the Organisation for Economic Co-operation and Development ("OECD") Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (2016) and related Supplements (the "OECD Due Diligence Guidance"). However, no evidence found of a commitment to responsible sourcing of minerals (avoiding human rights impacts and benefiting armed groups) from high risk areas beyond DRC and conflict-affected.. [Conflict Mineral Report 2018, 02/2019: apple.com & Supplier Responsibility Standards, 01/2019: apple.com] • Met: Based on OECD Guidance: See above. [Supplier Code of Conduct, 01/2019: apple.com & Supplier Responsibility Standards, 01/2019: apple.com] • Met: Requires responsible mineral sourcing from suppliers: In its Supplier Responsibility Standards, the Company indicates: 'Suppliers shall develop an appropriate management system to conduct due diligence in accordance with the standards set out in the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (the "OECD Guidance") and other applicable international standards, as described in this Standard (see Section 6 of this Standard). [...] Due diligence shall be conducted to the material processing level in order to determine whether relevant materials originate from regions with High Risks, which include areas associated with conflict, worst forms of child labor, forced labor and human trafficking, gross human rights violations such as widespread sexual violence, or other reasonably objective high risk activities, including severe health and safety risks and negative environmental impacts.' The document also includes a definition of High Risk Regions. Based on the Company's description, materials include minerals, and agricultural or biological based products. [Supplier Responsibility Standards, 01/2019: apple.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Responsible conflict mineral sourcing covers all minerals: 'Apple is committed to going beyond the minimum requirements in order to meet and exceed internationally accepted due diligence standards and protect people in its supply chain, with the ultimate goal of improving conditions on the ground in the Democratic Republic of the Congo ("DRC") and adjoining countries.' The Company indicates that it 'continues to use the RRA on a targeted basis to assess risks, with a particular focus on new smelters and refiners that enter its supply chain and on additional minerals beyond 3TG. ' However, this is a work in progress so its responsible sourcing policy commitment does not covers all minerals. [Conflict Mineral Report 2018, 02/2019: apple.com] • Not met: Suppliers expected to make similar requirements of their suppliers: In its Supplier Code of Conduct, the Company indicates: 'Suppliers shall exercise due diligence on relevant materials in their supply chains. [...] Due diligence shall be conducted to the material processing level in order to determine whether relevant materials originate from regions with high risks, which include areas associated with conflict, worst forms of child labor, forced labor and human trafficking, gross human rights violations such as widespread sexual violence, or other reasonably objective high risk activities, including severe health and safety risks and negative environmental impacts.' By Relevant Materials, the Company means: Any of the following: Cassiterite (Tin); Cobalt; Columbite-tantalite (Coltan) (Tantalum); Gold; Wolframite (Tungsten); Leather; Any additional minerals or materials notified to Suppliers by Apple'. In addition, in its latest Conflict Mineral Report 2018, the Company states that it 'require[s] suppliers to engage with smelters and refiners in Apple's supply chain to assess and identify a broader range of risks beyond conflict risk, such as social, environmental and human rights risks. [...] as part of its commitment to help to safeguard the well-being of people involved in its supply chain, Apple has integrated human rights impact measurements into its overall minerals due diligence program'. However, as indicated above, relevant materials, in terms of minerals mean 3TG and 'any additional minerals notified to Suppliers by Apple'. Not clear, if it covers all. [Supplier Code of Conduct, 01/2019: apple.com & Conflict Mineral Report 2018, 02/2019: apple.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1.3.ICT.b	Commitment to respect human rights particularly relevant to the industry (ICT)	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: Women's Rights: Although the Company has several initiatives related to women, such as its work for achieving pay equity in every country where it operates, no evidence found of a statement where the Company commits to respect women's rights. [Diversity, 09/2019: apple.com] • Not met: Children's Rights: The Company indicates in its MSA 2018: 'We are dedicated to protecting children throughout our ecosystem wherever our products are used and have continued to support innovation in this space. Apple's ICS team supports implementation of our robust policies focused on child protection at all levels of our software platform and throughout our supply chain.' However, no evidence found of a statement where the Company commits to respect children's rights. [2018 Statement on Efforts to Combat Human Trafficking and Slavery in Our Business and Supply Chains, 02/2019: apple.com] • Not met: Migrant worker's rights: It also indicates: 'We continuously strengthen our efforts to uphold the rights of foreign-contract workers in our supply chain. When labor supply is limited in one country but plentiful in another, some suppliers rely on third-party recruiters to secure foreign-contract workers from countries such as the Philippines, Nepal, Thailand, Indonesia, and Vietnam. A foreign contract worker is a person who seeks employment in a country other than the one of which he or she is a citizen. Of the millions of people who work at Apple supplier facilities every year, a small percentage are foreign contract workers. These individuals can be particularly vulnerable to debt-bonded labor, a form of modern slavery. Debt-bonded labor occurs when a person is forced to work in exchange for the repayment of a debt or other obligation—sometimes levied as a fee for receiving a job in the first place.' However, 'continuously strengthen our efforts to uphold the rights' is not considered a commitment statement according to CHRB methodology. • Met: Expecting suppliers to respect these rights: The Supplier Responsibility Standards include provision related to women's rights, such as: 'Supplier shall have a system to discipline supervisors, managers, or Workers who engage in any Physical Abuse, Sexual Harassment or sexual abuse, Psychological Harassment, or Verbal Harassment or Verbal Abuse, through measures such as compulsory counseling, warnings, demotions, and terminations or any combination thereof, regardless of whether such action was intended as a means to maintain labor discipline. [...] Security Practices. All security practices shall be gender appropriate and nonintrusive. [...] Pregnancy and Nursing Mothers Anti-Discrimination. 2.2. Supplier shall comply with all Applicable Laws and Regulations regarding pregnancy and postnatal employment protections, benefits, and pay. Supplier shall make reasonable accommodations for nursing mothers unless prohibited by Applicable Laws and Regulations. Supplier shall not (i) refuse to hire an applicant for a non-Hazardous position or (ii) terminate a Worker's employment solely based on the Worker's pregnancy or nursing status. Supplier shall not prohibit female Workers from becoming pregnant nor threaten female Workers with adverse employment consequences, including dismissal, loss of seniority, or deduction of wages, in order to discourage them from becoming pregnant. [...] Pregnancy and Medical Testing Supplier shall not require pregnancy tests or Medical Tests, including but not limited to Hepatitis B or HIV, either as a condition for employment or as a requirement for continued employment. [...] [Supplier Responsibility Standards, 01/2019: apple.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: CEDAW/Women's Empowerment Principles • Not met: Child Rights Convention/Business principles • Not met: Convention on migrant workers • Not met: Expecting suppliers to respect these rights
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: In its Conflict Mineral Report, the Company indicates: 'Apple engaged with a broad range of civil society, industry, and government experts and partnered with the Enough Project, an international human rights organization, to convene a series of expert group meetings to discuss opportunities to work collectively on innovative approaches to the responsible sourcing of minerals in the supply chain.' [Conflict Mineral Report 2018, 02/2019: apple.com & 2018 Statement on Efforts to Combat Human Trafficking and Slavery in Our Business and Supply Chains, 02/2019: apple.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Commits to engage stakeholders in design • Not met: Regular stakeholder design engagement: The Company also indicates: 'Apple worked with key stakeholders to develop a multi-stakeholder grievance

Indicator Code	Indicator name	Score (out of 2)	Explanation
			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 [...] However, it is not clear whether potentially or actually affected stakeholders participate in these actions. [Conflict Mineral Report 2018, 02/2019: apple.com]
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 Responsible Standards' document includes requirements to remedy specific cases such of non-compliances. 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'. In addition, the supplier standards document 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'. [Supplier Responsibility 2018 Progress Report, 2018: apple.com & 2018 Statement on Efforts to Combat Human Trafficking and Slavery in Our Business and Supply Chains, 02/2019: apple.com]
A.1.6	Commitment to respect the rights of human rights defenders	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: Zero tolerance attacks on HRs Defenders (HRDs): In its MSA Statement 2018 the Company indicates: 'Apple believes that empowering independent voices in the supply chain is critical to identifying, assessing, and remediating risks related to human trafficking and involuntary labor. In 2018, we continued to provide funding to the Fund for Global Human Rights, an organization that supports local human rights defenders and local activists in multiple countries, including in the DRC. Apple also continued to support the International Tin Association's International Tin Supply Chain Initiative whistleblowing mechanism in the DRC that allows people to anonymously voice concerns in their local language related to the extraction, trade, handling, and export of minerals so allegations of misconduct can be surfaced and reported.' A similar statement was included in its CMR 2018. However, CHRB could not find a statement where the Company commits to not tolerating attacks against human rights defenders. [2018 Statement on Efforts to Combat Human Trafficking and Slavery in Our Business and Supply Chains, 02/2019: apple.com & Conflict Mineral Report 2018, 02/2019: apple.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Expects ICT suppliers to reflect company HRD commitments

A.2 Policy Commitments (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.2.1	Commitment from the top	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: CEO or Board approves policy [Supplier Code of Conduct, 01/2019: apple.com & Business Conduct Policy, 10/2015: s22.q4cdn.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not met: Board level responsibility for HRs: The Company indicates on its website that : 'Apple's Board of Directors oversees the Chief Executive Officer and other senior management in the competent and ethical operation of Apple on a day-to-day basis and assures that the long-term interests of shareholders are being served. To satisfy the Board's duties, directors are expected to take a proactive, focused approach to their positions, and set standards to ensure that Apple is committed to business success through the maintenance of high standards of responsibility and ethics.' In addition, in its 'Combat Human Trafficking' document, the Company states: 'Apple Inc.'s Board of Directors oversees its CEO and other senior management in the competent and ethical operation of Apple on a day-to-day basis, including implementation of Apple's programs.' However, CHRB could not find further information describing specific governance oversight task of one or more areas of respect for human rights for a board committee. [Leadership and Governance, 04/2019: https://investor.apple.com/investor-relations/leadership-and-governance/default.aspx#Apple\apple.xlsx#Sources summary!E1 & 2018 Statement on Efforts to Combat Human Trafficking and Slavery in Our Business and Supply Chains, 02/2019: apple.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Speeches/letters by Board members or CEO
A.2.2	Board discussions	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: Board/Committee review of salient HRs: The Company provided information to CHRB in relation to this indicator, but it was not material. • Not met: Examples or trends re HR discussion <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both examples and process
A.2.3	Incentives and performance management	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: Incentives for at least one board member • Not met: At least one key ICT HR risk, beyond employee H&S <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Performance criteria made public

B. Embedding Respect and Human Rights Due Diligence (25% of Total)

B.1 Embedding Respect for Human Rights in Company Culture and Management Systems (10% of Total)

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: s22.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, 09/2019: 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 our Global Security, Business Conduct, and Supplier Responsibility ("SR") teams. The Global Security team sits within Apple's Legal group and seeks to identify risks across the enterprise and mitigate them with efficient and effective security solutions. The Business Conduct team also sits within Apple's Legal group and works to have Apple conduct business ethically, honestly, and in full compliance with applicable laws and regulations. The SR team sits in Apple's World Wide Operations group and seeks to coordinate activities related to our Supplier 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 ("ICS") team, Business Conduct, Legal, Finance, Product Design, Procurement, Manufacturing Operations, and Retail groups'. [2018 Statement on Efforts to Combat Human Trafficking and Slavery in Our Business and Supply Chains, 02/2019: apple.com] Met: Day-to-day responsibility for ICT in supply chain: See above [2017 Statement on Efforts to Combat Human Trafficking and Slavery in Our Business and Supply Chains, 02/2018: https://apple.com summary!E]
B.1.2	Incentives and performance management	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: Senior manager incentives for human rights Not met: At least one key ICT HR risk, beyond employee H&S <p>Score 2</p> <ul style="list-style-type: none"> Not met: Performance criteria made public
B.1.3	Integration with enterprise risk management	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: HR risks is integrated as part of enterprise risk system: Its 10K Form 2018 summarizes the risks identified by the Company, although no evidence found in relation to human rights risks. [10k Form 2018, 11/2018: https://d18rn0p25nwr6d.cloudfront.net/CIK-0000320193/68027c6d-356d-46a4-a524-65d8ec05a1da.pdf#Apple\apple.xlsx#Sources summary!E1] <p>Score 2</p> <ul style="list-style-type: none"> Not met: Audit Ctte or independent risk assessment
B.1.4.a	Communication /dissemination of policy commitment(s) within Company's own operations	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: Communicates its policy to all workers in own operations: In its 'Combat Human Trafficking' 2018 Statement, the Company indicates: 'Apple's Anti-Human Trafficking Policy, which is a part of Apple's Business Conduct & Global Compliance program, is provided to all new employees.' However, this policy is not available in the public domain. On the other hand, the Company also indicates: 'All Apple corporate employees are provided annually with information on the Supplier Code and Apple's SR issue reporting process, and they are instructed to report anything that might be considered a violation, including forced labor, trafficking, or ethical violations.' [2018 Statement on Efforts to Combat Human Trafficking and Slavery in Our Business and Supply Chains, 02/2019: apple.com] <p>Score 2</p> <ul style="list-style-type: none"> Not met: Commits to all 4 ILO core conventions: See indicator A.1.2 Not met: Communication of policy commitments to stakeholder Not met: How policy commitments are made accessible to audience
B.1.4.b	Communication /dissemination of policy commitment(s) to business relationships	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: Commits to all 4 ILO core conventions for suppliers: See indicator A.1.2 Met: Requiring ICT suppliers to communicate policy down the chain: In its 'Combat Human Trafficking' 2018 Statement, the Company indicates: 'Suppliers are required to adhere to the Supplier Code and Standards, including any subsequent amendments or updates. Suppliers are also required to apply our requirements to their suppliers, and so forth, through all levels of the supply chain. [...] The Supplier Code is published in 15 languages and is publicly available on apple.com.[...] To support capability building of our suppliers, Apple's SupplierCare platform provides tutorials to educate suppliers on the Supplier Code requirements and best practices for business conduct. Tutorials range in topics from foreign contract worker protections to the responsible sourcing of minerals. New suppliers are enrolled in a three-month on-boarding process prior to their initial assessment. Apple also provides suppliers ongoing remote technical support, and, in some cases, onsite training to increase their understanding of the Supplier Code.' In addition, the

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			<p>Company states: 'Smelters and refiners deeper in our supply chain are held to similar standards and if they exhibit a lack of commitment to meet our Supplier Code and Standards, they risk losing Apple's business.' [2018 Statement on Efforts to Combat Human Trafficking and Slavery in Our Business and Supply Chains, 02/2019: apple.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Met: How HR commitments made binding/contractual: See above. Supplier standards apply to suppliers 'and their subsidiaries, affiliates, and subcontractors (each a "supplier") providing goods or services to Apple, or for use in or with Apple products. Suppliers are 'required to adhere' to both supplier code and standards. • Met: Including on ICT suppliers: As indicated above, Suppliers are also required to apply commitments to their suppliers, and so forth, through all levels of the supply chain. Requirements for suppliers include 'suppliers are required to adhere to the supplier code and standards, including any subsequent amendments or updates'. It also adds that 'Smelters and refiners deeper in our supply chain are held to similar standards and if they exhibit a lack of commitment to meet our Supplier Code and Standards, they risk losing Apple's business'. In addition, suppliers shall perform periodic evaluations of facilities and operations of its subcontractors and next-tier suppliers to ensure compliance with the Code (and permit Apple and any third party designated to do the same). [Supplier Responsibility Standards, 01/2019: apple.com & Supplier Code of Conduct, 01/2019: apple.com]
B.1.5	Training on Human Rights	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: Scores at least 1 on A.1.2: See indicator A.1.2 • Met: Trains all workers on HR policy commitments: The Company indicates that: 'Apple employees learn about the risk of trafficking in our supply chain during Apple's Business Conduct training. In 2018, 100% of Apple's employees, as well as interns and flexible workforce, were trained on Apple's Anti-Human Trafficking Policy as part of Apple's annually required mandatory Business Conduct training program'. [2018 Statement on Efforts to Combat Human Trafficking and Slavery in Our Business and Supply Chains, 02/2019: apple.com] • Not met: Trains relevant ICT managers including procurement: The Company made comment to CHRB in relation to this indicator. This indicator looks for specific evidence of human rights training relevant to their role for those managers that operate in (at least) procurement activities. <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Score of 2 on A.1.2: See indicator A.1.2 • Not met: Both requirements under score 1 met: See above
B.1.6	Monitoring and corrective actions	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: Scores at least 1 on A.1.2 • Not met: Monitoring implementation of HR policy commitments: The Company describes its 'Internal Monitor Process': 'All Apple employees participate in a mandatory, annual Business Conduct training that includes education on Apple's Anti-Human Trafficking Policy. The policy describes the escalation process by which employees and other third parties may report violations related to the policy to Apple's Business Conduct team or through anonymous reports via a third-party hotline.[...] We also have an internal system that enables our employees to alert Apple if they perceive an issue within their office, or if they visit a facility and see or hear something of concern. Following each submission, Apple investigates the reported issue to determine whether the report identifies a violation of our Supplier Code and Standards. In 2018, 17 incidents were reported and investigated, with the SR team following up on each within 24 hours.' However, it is not clear if the company actively monitors human rights compliance within own operations. [2018 Statement on Efforts to Combat Human Trafficking and Slavery in Our Business and Supply Chains, 02/2019: apple.com] • Met: Monitoring ICT suppliers: In its 'Combat Human Trafficking' 2018 Statement, the Company indicates: 'Every year, we audit supplier performance against our Supplier Code. Unique to Apple's process is the training and capability building that accompanies each audit. Driving some of the highest standards in the world means continuously raising them, and helping our suppliers meet them. In 2018, we completed 770 Apple-managed supplier audits covering manufacturing facilities, logistics and repair centers, and contact center facilities. If we discover that standards aren't being met, we work side by side with suppliers to help them improve. Apple selects upcoming supplier audits based on a number of factors, including geographic risk, previous audit performance, manufacturing process risks, and planned spend. take into account concerns brought to us by internal teams, external stakeholders, and nongovernmental organizations ("NGOs") to make

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>decisions about audit selection. In addition to regular, pre-scheduled audits, we randomly select facilities for unannounced audits by Apple or independent third-party auditors.' [2018 Statement on Efforts to Combat Human Trafficking and Slavery in Our Business and Supply Chains, 02/2019: apple.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Score of 2 on A.1.2 • Met: Describes corrective action process: See above. In addition: 'When a core violation is identified, Apple issues a Notice of Probation directly to the president or CEO of the supplier, and we work to reduce production volumes at the offending supplier. Core violations are required to be addressed immediately. When appropriate, we also report these violations to local authorities. Any supplier with a documented core violation is placed on probation until successful completion of their next audit. During probation, the issue is monitored closely by Apple auditors, and if we believe the supplier is not truly committed to corrective action, we consider terminating our business relationship.' In addition, the Company reports: 'In 2018, 27 Core Violations were uncovered in Labor and Human Rights; these included 24 Working Hours Falsification Violations, two Debt-Bonded Labor Violations, and one Underage Labor Violation.' [2018 Statement on Efforts to Combat Human Trafficking and Slavery in Our Business and Supply Chains, 02/2019: apple.com] • Met: Example of corrective action: The Company reports: 'When the Supplier Code is not met, we believe direct remedy is required. This includes a supplier repaying any fees paid by supplier employees to obtain their jobs. Since 2008, US\$30.9 million in recruitment fees have been repaid to 36,137 employees by suppliers. In 2018, two cases of debt-bonded labor were uncovered in Japan at two supplier sites. In each case, the supplier was required to repay all fees to their impacted employees. A total of US\$616,000 in recruitment fees was repaid to 287 supplier employees.' [2018 Statement on Efforts to Combat Human Trafficking and Slavery in Our Business and Supply Chains, 02/2019: apple.com] • Not met: Discloses % of ICT supply chain monitored: 'Apple-managed audits in 2018 covered 93 percent of Apple's supplier direct spend'. However, it is not clear what% of its supply chain does this percentage represent. [2018 Statement on Efforts to Combat Human Trafficking and Slavery in Our Business and Supply Chains, 02/2019: apple.com]
B.1.7	Engaging business relationships	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: HR affects ICT selection of suppliers: In its 'Combat Human Trafficking' 2018 Statement, the Company indicates: 'Through our responsible procurement program, we assess new suppliers before they enter our supply chain and before business is awarded. A dedicated team in Apple's Product Operations group uses a supplier selection framework that includes comprehensive questions on human rights and risks of human trafficking, including on debt-bonded labor. In 2018, we enhanced this framework to assess labor recruitment risks deeper in the supply chain and earlier in a supplier's hiring process.' [2018 Statement on Efforts to Combat Human Trafficking and Slavery in Our Business and Supply Chains, 02/2019: apple.com] • Met: HR affects on-going ICT supplier relationships: The Company indicates in its Supplier Code of Conduct that it 'will assess its suppliers' compliance with this Code, and any violations of this Code may jeopardize the supplier's business relationship with Apple, up to and including termination'. The Company also indicates that: 'When a core violation is identified, Apple issues a Notice of Probation directly to the president or CEO of the supplier, and we work to reduce production volumes at the offending supplier. Core violations are required to be addressed immediately. When appropriate, we also report these violations to local authorities. Any supplier with a documented core violation is placed on probation until successful completion of their next audit. During probation, the issue is monitored closely by Apple auditors, and if we believe the supplier is not truly committed to corrective action, we consider terminating our business relationship.' [Supplier Code of Conduct, 01/2019: apple.com & 2018 Statement on Efforts to Combat Human Trafficking and Slavery in Our Business and Supply Chains, 02/2019: apple.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Both requirement under score 1 met: See above • Met: Working with ICT suppliers to improve performance: In its 'Supplier Responsibility 2019 Progress Report', the Company indicates: 'Following an assessment, we partner with a supplier to develop a corrective action plan to make improvements where needed. Ongoing engagements with our suppliers can include months on the ground working with suppliers, providing training, tools, and

Indicator Code	Indicator name	Score (out of 2)	Explanation
			support to help them meet our standards. To support capability building, Apple's SupplierCare platform provides information to increase understanding of the Supplier Code of Conduct and educate suppliers on best practices. Tutorials range in topics from safe storage of chemicals to responsibly sourcing minerals. In 2018, SupplierCare expanded to provide online trainings to 219 active supplier facilities.' [Supplier Responsibility 2018 Progress Report, 2018: apple.com]
B.1.8	Approach to engagement with potentially affected 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: Stakeholder process or systems: Although the Company has put in place different grievance mechanisms open to anyone who wants to send feedback to the Company on Supplier Responsibility, CHRB could not find information describing how the Company identifies its potentially affected stakeholders, how it engages with them systematically, including triggers and frequencies of engagement. • Not met: Frequency and triggers for engagement: See below. No evidence found of detailed evidence for frequency and triggers for engagement with affected stakeholders, with the exception of the description below, where the Company shows how it engages with workers in the supply chain through surveys in case labour rights are not respected. Although there's no detail of frequency, it is a permanent mechanisms, through which the Company reports having received 22,000 surveys in 2016. • Met: Workers in ICT SC engaged: See below. No evidence found of detailed evidence for frequency and triggers for engagement with affected stakeholders, with the exception of the description below, where the Company shows how it engages with workers in the supply chain through surveys in case labour rights are not respected. Although there's no detail on frequency, it is a permanent mechanism, through which the Company reports having received 22,000 surveys in 2016. [SR 2017 Progress Report, 2017: apple.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Analysis of stakeholder views and company's actions on them

B.2 Human Rights Due Diligence (15% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
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 2018 that 'In 2016, Apple first developed its Risk Readiness Assessment ("RRA") tool to help assess risks in its supply chain beyond those associated with conflict, such as social, environmental, and human rights risks. In particular, the RRA includes assessment categories related to how smelters and refiners treat artisanal and small-scale mining formalization. [...] As part of its human rights due diligence and commitment to safeguard the well-being of people involved in its supply chain, Apple expanded its efforts to integrate human rights impact measurements into its responsible sourcing program in 2018. [...] Apple believes that measuring human rights impacts is a critical part of its due diligence process and that stakeholders should work together to further measure the impact of 3TG due diligence systems.' 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. [Material Impact Profiles, 2019: apple.com & Conflict Mineral Report 2018, 02/2019: apple.com] • Met: Identifying risks in ICT suppliers: See above.

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<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 Democratic Republic of the Congo ("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. [2018 Statement on Efforts to Combat Human Trafficking and Slavery in Our Business and Supply Chains, 02/2019: apple.com] • Not met: In consultation with stakeholders • Not met: In consultation with HR experts • Not met: Triggered by new circumstances [2018 Statement on Efforts to Combat Human Trafficking and Slavery in Our Business and Supply Chains, 02/2019: apple.com]
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 to develop mitigation / prevention strategies /actions to face this issues, but to eliminate high risks materials. In addition, the Company indicates in its Conflict Mineral Report 2018 that 'In 2016, Apple first developed its Risk Readiness Assessment ("RRA") tool to help assess risks in its supply chain beyond those associated with conflict, such as social, environmental, and human rights risks. In particular, the RRA includes assessment categories related to how smelters and refiners treat artisanal and small-scale mining formalization. [...] As part of its human rights due diligence and commitment to safeguard the well-being of people involved in its supply chain, Apple expanded its efforts to integrate human rights impact measurements into its responsible sourcing program in 2018. [...].' 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 the process to assess these risks and impacts, including how it takes social, geographical, economic or other factors into account. [Material Impact Profiles, 2019: apple.com & Conflict Mineral Report 2018, 02/2019: 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

Indicator Code	Indicator name	Score (out of 2)	Explanation
			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] Score 2 • 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	The individual elements of the assessment are met or not as follows: Score 1 • 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 • 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 • 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 • 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

C. Remedies and Grievance Mechanisms (15% of Total)

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 • 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: s22.q4cdn.com] Score 2 • 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, 09/2019: 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 • Not met: Grievance mechanism for community: The Company indicates in its 'Conflict Mineral Report 2018', 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' 2018 Statement, the Company 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.' 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 in conflict minerals related cases or in relation to Supplier

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Responsibility [Conflict Mineral Report 2018, 02/2019: apple.com & 2018 Statement on Efforts to Combat Human Trafficking and Slavery in Our Business and Supply Chains, 02/2019: apple.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Describes accessibility and local languages • 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, 09/2019: apple.com]
C.3	Users are involved in the design and performance of the channel(s)/mechanism(s)	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: Engages users to create or assess system • Not met: Description of how they do this <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Engages with users on system performance: In its Supplier Responsibility 2019 Progress Report, the Company indicates: 'In order to verify the effectiveness of channels, we interview numerous supplier employees during annual assessments in their local language without their managers present. These interviews seek to ensure that supplier employees have received training and are aware of proper channels to voice concerns.' However, CHRB could not find information describing how the company engages with the users of its own grievance mechanisms to assess its performance or effectiveness. [Supplier Responsibility 2019 Progress Report, 2019: apple.com] • Not met: Provides user engagement example on performance • Met: ICT suppliers consult users in creation or assessment: In its Supplier Responsibility Standard, the Company indicates: 'Supplier shall have documented processes by which to have a dialogue with Workers about concerns, including the design and functioning of the Grievance mechanism and specific Grievances raised by Workers.' [Supplier Responsibility Standards, 01/2019: apple.com]
C.4	Procedures related to the mechanism(s)/channel(s) are publicly available and explained	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: Response timescales: The Company provided information in relation to this indicator, however, no details found necessary to award. • Not met: How complainants will be informed • Not met: Who is handling the complaint <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Escalation to senior/independent level
C.5	Commitment to non-retaliation over complaints or concerns made	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 statement prohibiting retaliation: In its Business Conduct Policy, the Company states: 'Apple will not retaliate—and will not tolerate retaliation—against any individual for reporting a concern in good-faith with the Business Conduct Helpline'. [Business Conduct Policy, 10/2015: s22.q4cdn.com] • Met: Practical measures to prevent retaliation: Its Business Conduct Helpline 'is committed to keeping your issues and identity confidential. If you would be more comfortable doing so, you may contact the Helpline anonymously. Your information will be shared only with those who have a need to know, such as those involved in answering your questions or investigating and correcting issues you raise.' [Business Conduct Policy, 10/2015: s22.q4cdn.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Has not retaliated in practice [Business Conduct Policy, 10/2015: s22.q4cdn.com] • Not met: Expects ICT suppliers to prohibit retaliation: In its Supplier Code of Conduct, the Company indicates: 'Supplier shall protect whistleblower confidentiality and prohibit retaliation.' However, the grievance channel is not open to other stakeholders beyond workers. [Supplier Code of Conduct, 01/2019: apple.com]
C.6	Company involvement with State-based judicial and non-judicial grievance mechanisms	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: Won't impede state based mechanisms • Not met: Complainants not asked to waive rights <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Will work with state based or non judicial mechanisms • Not met: Example of issue resolved (if applicable)

Indicator Code	Indicator name	Score (out of 2)	Explanation
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 2019 Progress Report, the Company indicates: 'When the Supplier Code is not met, we believe direct remedy is required. This includes a supplier repaying any fees paid by supplier employees to obtain their jobs. Since 2008, US\$30.9 million in recruitment fees have been repaid to 36,137 employees by suppliers. In 2018, two cases of debt-bonded labor were uncovered in Japan at two supplier sites. In each case, the supplier was required to repay all fees to their impacted employees. A total of US\$616,000 in recruitment fees was repaid to 287 supplier employees.' [Supplier Responsibility 2019 Progress Report, 2019: apple.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Changes introduced to stop repetition: In its Supplier Responsibility 2019 Progress Report, the Company discloses information about the changes to systems and procedures implemented to prevent debt-bonded labor: '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.' In addition in its MSA, the Company indicates: 'In 2018, we took steps to strengthen implementation of Apple's standards at the recruitment level with the aim of moving further from remedy to prevention. Apple continued to partner with the IOM to develop tools and trainings for suppliers on topics such as conducting worker interviews. Through participating labor agents, we have taken steps to educate prospective supply chain employees about their workplace rights before they leave their country of origin, including strengthening pre-departure orientations where individuals are educated on their labor rights, contract terms, the culture of their new country of employment, and how to anonymously report illegal practices and abuse. Since 2015, pre-departure orientations have been organized in six different locations, benefitting migrant workers from Philippines, Indonesia, Nepal, and Vietnam. In 2018, we enhanced our program to work directly with labor agencies in sending countries to focus beyond the content of training, to effective methods of delivering the training. Five of the largest labor agencies who provide foreign contract workers to our supply chain participated in training to effectively deliver a pre-departure orientation to foreign contract workers in their primary language. Together these agencies account for sending approximately 15,000 foreign contract workers abroad every year.' [Supplier Responsibility 2019 Progress Report, 2019: apple.com & 2018 Statement on Efforts to Combat Human Trafficking and Slavery in Our Business and Supply Chains, 02/2019: apple.com] • Not met: Evaluation of the channel/mechanism

D. Performance: Company Human Rights Practices (20% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.4.1.b	Living wage (in the supply chain)	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: Living wage in supplier code or contracts: The Company indicates in its Supplier Code of Conduct: 'Supplier shall pay at least the minimum wage and provide any benefits required by law and/or contract. Supplier shall compensate workers for overtime hours at the legal premium rate.' However, no reference found to living wage, covering basic needs of employees and families or dependants, and some discretionary income. [Supplier Code of Conduct, 01/2019: apple.com] • Not met: Improving living wage practices of suppliers <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met • Not met: Provide analysis of trends demonstrating progress
D.4.2	Aligning purchasing decisions with 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: Avoids business model pressure on HRs • Not met: Positive incentives to respect human rights

Indicator Code	Indicator name	Score (out of 2)	Explanation
			Score 2 • Not met: Both requirements under score 1 met
D.4.3	Mapping and disclosing the supply chain	0.5	The individual elements of the assessment are met or not as follows: Score 1 • Not met: Identifies suppliers back to product source: The Company indicates in its 'Combat Human Trafficking' 2018 Statement that it was the 'one of the first company to map our supply chain, including from manufacturing to the smelter and refiner level for tin, tantalum, tungsten, and gold ("3TG"). In 2014, we started mapping our supply chain for cobalt and completed that mapping in 2016.' However, it is not clear whether the identification includes also indirect suppliers (component manufacturers). [2018 Statement on Efforts to Combat Human Trafficking and Slavery in Our Business and Supply Chains, 02/2019: apple.com] Score 2 • Met: Discloses significant parts of supply chain and why: The Company discloses its Supplier List which details its 'top 200 suppliers based on spend, and outlines the supplier facilities which provide services to our supply chain'. The list includes the name and addresses of suppliers. 'The Apple Supplier List represents 98 percent of procurement expenditures for materials, manufacturing, and assembly of our products worldwide for fiscal year 2018'. [Supplier List, 2019: apple.com]
D.4.4.b	Prohibition on child labour: Age verification and corrective actions (in the supply chain)	1	The individual elements of the assessment are met or not as follows: Score 1 • Met: Child Labour rules in codes or contracts: In its Supplier Responsibility Standard, the Company indicates: Supplier shall employ only Workers who are at least 15 years of age, or the applicable minimum legal age for employment, or the applicable age for completion of compulsory education, whichever is highest. [...] Supplier shall establish and implement appropriate age documentation and verification management systems to ensure that Underage Workers are not working on site.[...] If any Active Underage Worker, Historical Underage Worker, or Terminated Underage Worker is found either through an external audit or self-review, Supplier shall notify Apple immediately and shall implement a remediation program as directed by Apple.' The document includes details of the different steps for remediation. [Supplier Responsibility Standards, 01/2019: apple.com] • Not met: How working with suppliers on child labour: The Company indicates that 'When underage labor is uncovered, specialized third-party assessors are brought in for an in-depth review of the case. The supplier is required to stop the underage employee from continuing to work and to return him or her safely home. Educational opportunities are presented to the underage employee and his or her guardians. While the underage employee is attending school, the supplier is required to pay tuition and other associated fees, and must continue to pay his or her wages. Follow-up is conducted to ensure the individual's overall well-being, both at school and at home. Once the student reaches legal working age, the supplier is also required to offer the individual employment.' However, no evidence found in relation to how the Company actively works with suppliers to eliminate child labour and to improve working conditions for young workers. [Supplier Responsibility 2019 Progress Report, 2019: apple.com] Score 2 • Not met: Both requirements under score 1 met • Not met: Provide analysis of trends demonstrating progress: Each year the Company discloses information about the number of child labour cases found in its Supplier Responsibility Reports. For instance in its Supplier Responsibility 2019 Progress Report, the Company indicates that it uncovered one case of Underage Labor. Although it each year's report describes performance for the year, this indicator is looking for evidence of the Company comparing itself performance year on year. [Supplier Responsibility 2019 Progress Report, 2019: apple.com & Supplier Responsibility 2018 Progress Report, 2018: apple.com]
D.4.5.b	Prohibition on forced labour: Debt bondage and other unacceptable financial costs (in the supply chain)	1.5	The individual elements of the assessment are met or not as follows: Score 1 • Met: Debt and fees rules in codes or contracts: In its Supplier Responsibility Standard, the Company indicates: 'Workers shall not be required to pay employers' or their agents' recruitment, application, recommendation, hiring, placement, or processing fees of any kind for their employment. [...] Deposits from Workers are prohibited unless required by Applicable Laws and Regulations. [...] Personal loans to Workers or job seekers under circumstances where repayment terms could be construed as debt bondage or forced labor are prohibited.' [Supplier Responsibility Standards, 01/2019: apple.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Met: How working with suppliers on debt & fees: In its 'Combat Human Trafficking' 2018 Statement, the Company indicates: 'To support capability building of our suppliers, Apple's SupplierCare platform provides tutorials to educate suppliers on the Supplier Code requirements and best practices for business conduct. Tutorials range in topics from foreign contract worker protections to the responsible sourcing of minerals. New suppliers are enrolled in a three-month onboarding process prior to their initial assessment. Apple also provides suppliers ongoing remote technical support, and, in some cases, onsite training to increase their understanding of the Supplier Code. Certain suppliers, such as those that provide janitorial and facilities services to Apple retail stores and other sites, also receive specialized training related to human trafficking prevention and ways to mitigate risks associated with debt-bonded labor that are specific to the service supply chain.' In addition, in its Supplier Responsibility Report 2019, the Company indicates: '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.' [2018 Statement on Efforts to Combat Human Trafficking and Slavery in Our Business and Supply Chains, 02/2019: apple.com & Supplier Responsibility 2019 Progress Report, 2019: apple.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Both requirements under score 1 met • Not met: Provide analysis of trends in progress made
D.4.5.d	Prohibition on forced labour: Restrictions on workers (in the supply chain)	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: Free movement rules in codes or contracts: In its Supplier Responsible Standards, the Company indicates: 'Workers shall retain possession or control of all identity documents, such as passports, identity papers, travel documents, and other personal legal documents. Supplier shall not require surrender of Workers' original identity documents, withhold Workers' original identity documents, or restrict Workers' access to original identity documents for any reason. [...] All Workers shall have the right to freely enter into and to terminate their employment. [...] Suppliers shall not have direct control of, or access to, Worker bank accounts other than to make direct deposits of compensation.' [Supplier Responsibility Standards, 01/2019: apple.com] • Not met: How these practices are implemented and monitored for agencies, labour brokers or recruiters: The Company provided information to CHRB in relation to this indicator, but it was not material. <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met • Not met: Provide analysis of trends in progress made
D.4.6.b	Freedom of association and collective bargaining (in the supply chain)	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: FoA & CB rules in codes or contracts: In its Supplier Responsible Standards, the Company indicates: '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.' They also indicate that 'where country law substantially restricts freedom of association, supplier shall allow alternative means for workers to individually and collectively engage with supplier, including processes for workers to express their grievances and protect the rights regarding working conditions and terms of employment'. [Supplier Responsibility Standards, 01/2019: apple.com] • Not met: How working with suppliers on FoA and CB <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met • Not met: Provide analysis of trends in progress made: Each year the Company discloses some information about freedom association and collective bargaining non-compliances found during audits. For example, in SR 2019, the Company indicates that 'A lower percentage of assessment violations were found relating to anti-harassment, prevention of underage labor, and freedom of association and collective bargaining.' However, no evidence found of trends/analysis demonstrating evolution over time. [Supplier Responsibility 2019 Progress Report, 2019: apple.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.4.7.b	Health and safety: Fatalities, lost days, injury rates (in the supply chain)	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: Sets out clear Health and Safety requirements: The Company indicates: 'Supplier shall identify, evaluate, and manage occupational health and safety hazards through a prioritized process of hazard elimination, substitution, engineering controls, administrative controls, and/or personal protective equipment.' The Company sets out Health and Safety requirements in its Supplier Responsibility Standards, including the following topics: Regulatory Permits; Occupational Health and Safety Risk Assessment; Machine Guarding; Electrical Safety; Lockout/Tagout; High Risk Tasks; Chemical Management; Industrial Hygiene; Medical Surveillance; Personal Protective Equipment (PPE); Ergonomics; Combustible Dust; Training and Communication; and Documentation. [Supplier Responsibility Standards, 01/2019: apple.com] • Not met: Injury rate disclosures • Not met: Lost days or near miss disclosures • Not met: Fatalities disclosures • Not met: Occupational disease rates <p>Score 2</p> <ul style="list-style-type: none"> • Met: How working with suppliers on H&S: The Company indicates in its SR 2019 that 'Since 2014, we've partnered with suppliers to implement an industry- leading Chemical Management Program to protect the people who help make Apple products, and the environment. The program provides support and education that enables participating suppliers to implement a rigorous chemical management system that includes driving transparency about chemical use, volumes consumed, and strengthening safe-use practices. [...] We also partner with suppliers to provide support and training to help them meet our high standards. In 2018, 500 suppliers participated in training on the RSS [Regulated Substances Specification]. Material safety data sheets are commonly used to quickly screen chemicals for compliance with restrictions.' [Supplier Responsibility 2019 Progress Report, 2019: apple.com] • Not met: Provide analysis of trends in progress made
D.4.8.b	Women's rights (in the supply chain)	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: Women's rights in codes or contracts: The Supplier Responsibility Standards include some provisions related to women's rights, such as: 'Supplier shall not Discriminate against any Worker based on race, color, age, gender, [...] or gender identity in hiring and employment practices such as applications for employment, promotions, rewards, access to training, job assignments, wages, benefits, discipline, and termination, unless prohibited by law. [...] Supplier shall have a system to discipline supervisors, managers, or Workers who engage in any Physical Abuse, Sexual Harassment or sexual abuse, Psychological Harassment, or Verbal Harassment or Verbal Abuse, through measures such as compulsory counseling, warnings, demotions, and terminations or any combination thereof, regardless of whether such action was intended as a means to maintain labor discipline. [...] Security Practices. All security practices shall be gender appropriate and nonintrusive. [...] Pregnancy and Nursing Mothers Anti-Discrimination. 2.2.Supplier shall comply with all Applicable Laws and Regulations regarding pregnancy and postnatal employment protections, benefits, and pay. Supplier shall make reasonable accommodations for nursing mothers unless prohibited by Applicable Laws and Regulations. Supplier shall not (i) refuse to hire an applicant for a non-Hazardous position or (ii) terminate a Worker's employment solely based on the Worker's pregnancy or nursing status. Supplier shall not prohibit female Workers from becoming pregnant nor threaten female Workers with adverse employment consequences, including dismissal, loss of seniority, or deduction of wages, in order to discourage them from becoming pregnant. [...] Pregnancy and Medical Testing Supplier shall not require pregnancy tests or Medical Tests, including but not limited to Hepatitis B or HIV, either as a condition for employment or as a requirement for continued employment. [...]' [Supplier Responsibility Standards, 01/2019: apple.com] • Not met: How working with suppliers on women's rights <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirement under score 1 met • Not met: Provide analysis of trends in progress made

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.4.9.b	Working hours (in the supply chain)	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: Working hours in codes or contracts: 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. [Supplier Responsibility Standards, 01/2019: apple.com & Supplier Code of Conduct, 01/2019: apple.com] • Not met: How working with suppliers on working hours: The Company indicates in its SR 2019 that: 'If falsification of employee working hours is discovered, the violation is escalated to the supplier CEO and the supplier is placed on immediate probation. The supplier's ethics policy and management systems are then thoroughly reviewed to identify the root causes and systemically correct them. The supplier is required to undergo regular audits to ensure the reviewed policy is implemented to prevent future violations. In addition, the supplier must revise all records to reflect an accurate accounting of hours worked by their employees.' However, no evidence found in relation to how the Company works with suppliers (proactively) to improve their practices in relation to working hours. [Supplier Responsibility 2019 Progress Report, 2019: apple.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met • Not met: Provide analysis of trends in progress made: The Company reports that 'In 2018, the majority of Labor and Human Rights violations found in our assessments were related to working hours violations and improper provision of wages and benefits.' However, no evidence found of analysis /trends showing evolution over time. [Supplier Responsibility 2019 Progress Report, 2019: apple.com]
D.4.10.a	Responsible Mineral Sourcing: Arrangements with Suppliers and Smelters/Refiners in the Mineral Resource Supply Chains	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: Responsible mineral sourcing due diligence in supplier contracts: The Supplier Responsibility Standards that 'Suppliers shall develop an appropriate management system to conduct due diligence in accordance with the standards set out in the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (the "OECD Guidance") and other applicable international standards'. The Supplier Responsibility Standards is a 'supplement the Apple Supplier Code of Conduct', and the Company indicates that 'Suppliers must meet these Standards to be in compliance with the Code. The terms and conditions of the Code are incorporated into these Standards and these Standards shall govern and be deemed to modify the Code if there are any conflicting provisions. The Company states that 'Suppliers are required to adhere to the Supplier Code and Standards, including any subsequent amendments or updates'. [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] • Met: Builds capacity with smelters/refiners: In its Supplier Responsibility Report, the Company indicates with respect its work with smelters: 'Our efforts go beyond conflict to consider human rights and other risks, and we go above and beyond what's required by law to help smelters report, assess, and mitigate risk in their business practices. In-person spot audits of suppliers are conducted to verify the accuracy of reported data and to ensure corrective actions are taken where gaps may exist. In addition to offering new and current suppliers online trainings in English and Mandarin, Apple provides tailored support to suppliers where material gaps in management systems are identified.' [Supplier Responsibility 2018 Progress Report, 2018: apple.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Disclosure of smelter information in supplier requirements: See above about adherence requirement. In its Supplier Responsible Standards document, the Company includes some provision related to the Reporting of the Due Diligence Process: 'Suppliers shall provide evidence of their Supply Chain mapping and verification or audit of identified Material Processors according to specific risks and Relevant Materials: Conflict issues pertaining to tin, tantalum, tungsten, and gold shall be reported to Apple twice annually [...]; Cobalt and other Relevant Mineral Supply Chain mapping shall be reported annually [...]' [Supplier Responsibility Standards, 01/2019: apple.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not met: Responsible conflict mineral sourcing covers all minerals: See above. Requirement refers to 3TG, cobalt and other relevant mineral. However, considering that no evidence found of the Company's commitment covering all minerals, it is not clear whether suppliers are expected to cover all minerals (as indicated, any additional mineral notified by Apple). [Supplier Responsibility Standards, 01/2019: apple.com]
D.4.10.b	Responsible Mineral Sourcing: Risk Identification in Mineral Supply Chain	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: Risk identification and disclosure in line with OECD Guidance: One activity to identify risks consists in requiring suppliers utilizing 3TG to submit an industry-wide standard Conflict Minerals Reporting template. Suppliers are also required 'to inform Apple immediately if they identify certain high risks (such as conflict risks, risks included in Annex II of the OECD Due Diligence Guidance, human rights risks and certain other risks) associated with 3TG. It also indicates that developed its Risk Readiness assessment (RRA) tool to help assess risks in its supply chain beyond those associated with conflict, such as social, environmental and human rights risks. In particular, the RRA includes assessment categories related to how smelters and refiners treat artisanal and small-scale mining formalization. [Conflict Mineral Report 2018, 02/2019: apple.com] • Met: Identification of smelter/refiners and OECD due diligence: In addition, it indicates: 'Apple collects and processes data provided by suppliers through their completion of the CMRT and other sources of information to map Apple's supply chain to the smelter and refiner level and to the mine-site level, to the extent available. [...] Apple believes that Third Party Audits play a significant role in providing assurances that smelters and refiners have appropriate due diligence systems in place and help ensure that operations and sourcing practices do not support conflict in the DRC and adjoining countries.' 'To date, through advocacy and influence, Apple has driven a steady increase in smelters and refiners participating in Third Party Audits. In 2015, Apple reached its goal of a 100 percent rate of participation in Third Party Audit programs by identified smelters and refiners in its supply chain, and Apple continued to achieve a 100 percent rate of participation in 2016, 2017, and 2018.' [Conflict Mineral Report 2018, 02/2019: apple.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Discloses smelters/refiners judged in line with OECD due diligence: The Company discloses its Smelters and refiners reported in Apple's supply chain List in its Conflict Mineral Report 2018. As indicated above, Apple continued to achieve a 100 percent rate of participation [in third party audits] in 2016, 2017, and 2018.' However, is not clear if all the smelters/refiners listed are already conformant, or if it discloses which of those list are conformant. [Conflict Mineral Report 2018, 02/2019: apple.com] • Not met: Responsible conflict mineral sourcing covers all minerals: The Company's Conflict Mineral Report 2018 is focused only in 3TG minerals (see Annex II: Smelter and Refiner Lists) [Conflict Mineral Report 2018, 02/2019: apple.com]
D.4.10.c	Responsible Mineral Sourcing: Risk Management in the Mineral Supply Chain	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: Describes mineral risk management plan for supply chain: The Company describes the following as risk mitigation measures: A) Encouraging its suppliers to adopt best practices for the responsible sourcing of materials; B) Collaborating with industry groups and NGOs to continue improving traceability of 3TG. C) Supporting independent local stakeholders to identify relevant risks and raise grievances related to conditions in and around mining areas for 3TG. D) Working with stakeholders, including the OECD, to measure impacts of due diligence programs on conditions in the DRC and adjoining countries. E) Continuing to collaborate with relevant stakeholders to improve on how incidents and allegations are tracked and addressed on a transparent, industry-wide basis. [Conflict Mineral Report 2018, 02/2019: apple.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not met: Monitoring, tracking and whether better risk prevention/mitigation over time: In addition, it indicates: 'Apple believes Third Party Audits remain the foundation of robust due diligence systems. In particular, Apple believes that Third Party Audits play a significant role in providing assurances that smelters and refiners have appropriate due diligence systems in place and help ensure that operations and sourcing practices do not support conflict in the DRC and adjoining countries.' And it also states: 'Apple closely monitors completion of Third Party Audits and re-audits by the smelters and refiners in its supply chain. In the instances where there are delays on the part of the smelters and refiners in implementing corrective action plans developed by Third Party Audits, Apple leverages its downstream position to conduct applicable smelter or refiner outreach to reiterate the requirement to complete and close the associated corrective action plan in order to remain in Apple's supply chain.' However, CHRB could not find information describing how the Company monitor performance of risk prevention and mitigation measures, including whether there has been improvements. [Conflict Mineral Report 2018, 02/2019: apple.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Supplier and stakeholders engaged in risk management strategy: Although the Company engages with its suppliers and stakeholders through different initiatives, such as: communication of requirements to its direct suppliers annually and regularly engages with them using tailored communication and guidance throughout the year; providing access to online training materials through Apple's SupplierCare portal, tailored training that is specifically aimed at assisting suppliers to close identified gaps in suppliers' systems and implementation processes; or maintain a grievance mechanism that allows suppliers to report concerns or grievances in connection with 3TG mining, processing, and trading, CHRB could not find information describing how it engages with suppliers and affected stakeholders to agree on its strategy for risk management. [Conflict Mineral Report 2018, 02/2019: apple.com] • Not met: Responsible conflict mineral sourcing covers all minerals

E. Performance: Responses to Serious Allegations (20% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
E(1).0	Serious allegation No 1		<ul style="list-style-type: none"> • Headline: Apple facing child labour claims in its supply chain in the Democratic Republic of Congo • Area: Child labour • Story: On November 15, 2017, Amnesty International released a follow-up report regarding human rights abuses entering their cobalt supply chains amongst electronic and electric vehicle companies, including Apple. <p>The report assessed the policies and practices of 29 companies and how much their cobalt-sourcing practices have improved since its previous report published in January 2016. More than half of the world's cobalt, a key element in lithium-ion batteries, is sourced from the Democratic Republic of Congo (DRC), where Amnesty has found human rights abuses. Amnesty International stated that about a fifth of the country's cobalt production is mined by informal miners including children, often in dangerous conditions. The report also claimed that children as young as seven engaged in artisanal cobalt mining. Some of these children worked in the tunnels alongside adult miners, while most helped to pick through mine tailings and wash minerals prior to sale. Many were forced to carry out this hazardous work because their families were too poor to pay school fees. Children are also being subjected to beatings and extortion by security guards and exploited by traders.</p> <p>Amnesty International pointed out that Apple has made significant progress since the 2016 report and it is leading the way in tracing cobalt used in its electronics. Apple now explicitly lists cobalt among the minerals for which it requires supplier due diligence in line with international standards.</p> <p>The electronics companies and the automobile manufacturers included in the report are: Apple, Samsung SDI, Dell, HP, BMW, Tesla, LG Chem, Sony, Samsung Electronics, General Motors, Volkswagen, Fiat-Chrysler, Daimler, Hunan, Shanshan, Ampere Technology, Tianjin Lishen, Microsoft, Lenovo, Renault, Vodafone, Huawei, L&F, Tianjin B&M, BYD, Coslight, Shenzhen BAK and ZTE.</p> <ul style="list-style-type: none"> • Sources: [Amnesty International, 15/11/2017: amnesty.org][Reuters, 15/11/2017: reuters.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
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: In a letter to Amnesty International, Apple said that it had “requested that such artisanal mined material be appropriately segregated from the rest of the cobalt being supplied to Apple’s supply chain” and that it would accept ASM cobalt in its supply chain “[i]f Huayou Cobalt can establish that its artisanal cobalt is sourced responsibly in accordance with Apple’s rigorous standards and verified by an independent third party audit”. [Amnesty International report on child labour in DRC, 11/2017: amnesty.org] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Response goes into detail: In response to 2016 Amnesty report, Apple now explicitly lists cobalt among the minerals for which it requires supplier due diligence in line with international standards and discloses its assessment of child labour risks. [Amnesty International report on child labour in DRC, 11/2017: amnesty.org]
E(1).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 "Supplier shall employ only Workers who are at least 15 years of age, or the applicable minimum legal age for employment, or the applicable age for completion of compulsory education, whichever is highest. Supplier may provide legitimate workplace apprenticeship programs for educational benefit that are consistent with Article 6 of ILO Minimum Age Convention No. 138 or light work consistent with Article 7 of ILO Minimum Age Convention No. 138. [Supplier Responsibility Standards, 01/2019: apple.com] • Met: Policies apply to the type of business relationships involved: See above [Supplier Responsibility Standards, 01/2019: apple.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Policies address the specific rights in question: The Company implements age verification system: "Supplier shall establish and implement appropriate age documentation and verification management systems to ensure that Underage Workers are not working on site. The systems shall cover Supplier’s operations, Third-Party Employment Agencies, and Qualified Educational Programs." [Supplier Responsibility Standards, 01/2019: apple.com]
E(1).3	The Company has taken appropriate action	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"> • Not met: Engages with affected stakeholders: CHRB did not find the evidence of the Company’s engagement with affected stakeholders. • Met: Encourages linked business to engage affected stakeholders: See above. In addition, the Company details the requirements and remediation process for suppliers when a child labour is identified. [Supplier Responsibility Standards, 01/2019: apple.com] • Met: Provides remedies to affected stakeholders: Each year, the Company reports the number of child labour cases identified and send the children back home safely, providing them with an educational opportunity. [Supplier Responsibility Standards, 01/2019: apple.com] • Met: Has reviewed management systems to prevent recurrence: In response to the 2016 Amnesty report, the Company has reviewed its management system. Apple now explicitly lists cobalt among the minerals for which it requires supplier due diligence in line with international standards. In addition, Apple has provided suppliers with risk assessment tools and developed auditing standards to track performance and identify areas needing improvement. [Amnesty International report on child labour in DRC, 11/2017: amnesty.org] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Remedies are satisfactory to the victims: CHRB could not find the evidence showing that remedies are satisfactory to the victims. • Met: Has improved systems and engaged affected stakeholders: In the case of cobalt, 100% of the identified smelters/refiners in Apple’s supply chain are now undergoing independent third party audits. The Company has been engaging with the affected stakeholder, giving them remedies. [Amnesty International report on child labour in DRC, 11/2017: amnesty.org]
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: Forced labour/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.

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<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]
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: 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: 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: 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]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<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 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(3).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(3).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

Indicator Code	Indicator name	Score (out of 2)	Explanation
			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 and integrate sound health and safety management practices into its business". [Supplier Code of Conduct, 01/2019: apple.com] Score 2 <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(3).3	The Company has taken appropriate action	0.5	The individual elements of the assessment are met or not as follows: Score 1 <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] Score 2 <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]

F. Transparency (10% of Total)

Indicator Code	Indicator name	Score	Explanation
F.1	Company willingness to publish information	2.73 out of 4	Out of a total of 44 indicators assessed under sections A-D of the benchmark, Apple Inc made data public that met one or more elements of the methodology in 30 cases, leading to a disclosure score of 2.73 out of 4 points.
F.2	Recognised Reporting Initiatives	2 out of 2	The individual elements of the assessment are met or not as follows: Score 2 <ul style="list-style-type: none"> • Met: Company reports on GRI: The Company discloses a GRI Index in its website. The company state that 'these reports contain Standard Disclosures from the Global Reporting Initiative (GRI) G4 Sustainability Reporting Guidelines.' [GRI Index (website), 09/2019: apple.com] • Not met: Company reports on SASB • Not met: Company reports on UNGPRF
F.3	Key, High Quality Disclosures	0 out of 4	Apple Inc met 0 of the 8 thresholds listed below and therefore gets 0 out of 4 points for the high quality disclosure indicator. Specificity and use of concrete examples <ul style="list-style-type: none"> • Not met: Score 2 for A.2.2 : Board discussions • Not met: Score 2 for B.1.6 : Monitoring and corrective actions • Not met: Score 2 for C.1 : Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers • Not met: Score 2 for C.3 : Users are involved in the design and performance of the channel(s)/mechanism(s) Discussing challenges openly

Indicator Code	Indicator name	Score	Explanation
			<ul style="list-style-type: none"> • Not met: Score 2 for B.2.4 : Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts • Not met: Score 2 for C.7 : Remedying adverse impacts and incorporating lessons learned <p>Demonstrating a forward focus</p> <ul style="list-style-type: none"> • Not met: Score 2 for A.2.3 : Incentives and performance management • Not met: Score 2 for B.1.2 : Incentives and performance management

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

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As CHRB Ltd, 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.