**Corporate Human Rights Benchmark
2019 Company Scoresheet**

The CHRB is part of
the WBA

Company Name	Intel Corporation
Industry	ICT (Own operations and Supply Chain)
Overall Score (*)	35.8 out of 100

Theme Score	Out of	For Theme
2.8	10	A. Governance and Policies
10.6	25	B. Embedding Respect and Human Rights Due Diligence
6.7	15	C. Remedies and Grievance Mechanisms
3.5	20	D. Performance: Company Human Rights Practices
7.2	20	E. Performance: Responses to Serious Allegations
5.1	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	1	The individual elements of the assessment are met or not as follows: Score 1 • Met: General HRs commitment: Its Global Human Rights Principles 'formalizes Intel's commitment to respect human rights and embodies common principles reflected in the United Nations (UN) Global Compact, the Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights, core International Labour Organization Conventions, the Organization for Economic Co-operation and Development Guidelines for Multinational Enterprises, and the laws of the countries in which we operate.' [Human Rights Principles, Nov 2017: intel.com] • Met: UNGC principles 1 & 2: The Company is signatory of the UNGC. [UN Global Compact Commitment: unglobalcompact.org] Score 2 • Not met: UNGPs: See above. However, the statement is not consider a straightforward commitment to the UNGP. [Human Rights Principles, Nov 2017: intel.com] • Not met: OECD: See above. However, the statement is not consider a straightforward commitment to the OECD. [Human Rights Principles, Nov 2017: intel.com]
A.1.2	Commitment to respect the human rights of workers	0.5	The individual elements of the assessment are met or not as follows: Score 1 • Not met: ILO Core: The Company includes in its Global Human Rights Principles provisions in relation to discrimination, child labour, and forced labour. In relation to freedom of association and collective bargaining, the Company indicates states

Indicator Code	Indicator name	Score (out of 2)	Explanation
			the following: 'Intel recognizes that in many of the locations where we operate, employees have the right to freely associate or no associate with third-party organizations such as labor organizations, along with the right to bargain or not bargain collectively in accordance with local laws. Intel respect those rights and its further committed to treating our employees with dignity and respect […].' However, no evidence found of a commitment to respect these rights in all contexts and locations. [Human Rights Principles, Nov 2017: intel.com] • Met: UNGC principles 3-6: The Company is signatory of the UNGC. [UN Global Compact Commitment: unglobalcompact.org] • Not met: Explicitly list ALL four ILO for ICT suppliers: The Company indicates in its Global Human Rights Principles that it 'expects [its] suppliers to maintain progressive employment, environmental, health and safety, and ethics practices that meet or exceed all applicable laws and relevant external codes such as the Responsible Business Alliance (RBA) Code of Conduct, Intel's Code of Conduct, and these Human Rights Principles.' In addition, the Company used RBA Code of Conduct to set out the expectation to its suppliers. The RBA Code of Conduct includes provisions in relation to forced labour, child labour and discrimination. In relation to freedom of association and collective bargaining, it states the following: 'In conformance with local law, participants shall respect the right of all workers to form and join trade unions of their own choosing, to bargain collectively and to engage in peaceful assembly as well as respect the right of workers to refrain from such activities.' 'However, it is not clear whether the Company is respecting those rights in all contexts, as it indicates 'in conformance with local law'. [Human Rights Principles, Nov 2017: intel.com & RBA Code of Conduct (Version 6.0), 2018: responsiblebusiness.org] Score 2 • Not met: Explicit commitment to All four ILO Core: See above [Human Rights Principles, Nov 2017: intel.com] • Met: Respect H&S of workers: According to its Global Human Rights Principles, the Company 'is committed to providing a safe and healthful workplace for our employees, contractors, and communities.' [Human Rights Principles, Nov 2017: intel.com] • Met: H&S applies to ICT suppliers: See above. In addition, the RBA Code of Conduct sets out health and safety standards for suppliers. This Code used OHSAS 18001 and ILO Guidelines on Occupational Safety and Health as reference to set the standards. [Human Rights Principles, Nov 2017: intel.com & RBA Code of Conduct (Version 6.0), 2018: responsiblebusiness.org] • Not met: working hours for workers: The Company indicates in its Global Human Rights Principles document: 'Working hours are not to exceed the maximum set by local law or no more than 60 hours per week, whichever is stricter. Workers should not work longer than 6 consecutive days without at least one day off. […] Intel expects its suppliers to comply with these expectations.' However, no evidence found of references to standard weekly hours or the Company explicitly committing to respect ILO conventions on working hours. [Human Rights Principles, Nov 2017: intel.com] • Not met: Working hours for ICT suppliers: See above. In the RBA Code of Conduct, used by the Company in its Supply Chain, it is indicated: 'Working hours are not to exceed the maximum set by local law. Further, a workweek should not be more than 60 hours per week, including overtime, except in emergency or unusual situations. Workers shall be allowed at least one day off every seven days.' However, no evidence found of references to standard weekly hours or the Company explicitly committing to respect ILO conventions on working hours. In addition, it is not clear what 'exceptional or unusual situations would be. [Human Rights Principles, Nov 2017: intel.com & RBA Code of Conduct (Version 6.0), 2018: responsiblebusiness.org]
A.1.3.ICT.a	Commitment to responsible sourcing of minerals	1	The individual elements of the assessment are met or not as follows: Score 1 • Met: Responsible mineral sourcing in conflict areas: In its Conflict Mineral Sourcing Policy, the Company indicates that it 'is committed to the responsible sourcing of minerals-sourcing done in ethical and sustainable manner that safeguards the human rights of everyone in our global supply chain. […] Intel has evolved its responsible minerals program and related due diligence practices to address minerals originating from Conflict-Affected and High-Risk Areas (CAHRAs). […] In support of this policy, Intel commits to: exercise due diligence with relevant suppliers consistent with the OECD Guidance. […]'. [Responsible Minerals Sourcing Policy, Mar 2019: intel.com] • Met: Based on OECD Guidance: See above [Responsible Minerals Sourcing Policy, Mar 2019: intel.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			• Met: Requires responsible mineral sourcing from suppliers: The Company indicates in its Responsible Minerals Sourcing Policy, that its suppliers are required to: 'Establish and maintain a publicly available policy on responsible mineral sourcing that aligns with the OECD Guidance'; Establish due diligence frameworks and management systems consistent with the OECD Guidance including conflict affected and high risk areas [Responsible Minerals Sourcing Policy, Mar 2019: intel.com] Score 2 • Not met: Responsible conflict mineral sourcing covers all minerals • Not met: Suppliers expected to make similar requirements of their suppliers
A.1.3.ICT.b	Commitment to respect human rights particularly relevant to the industry (ICT)	0.5	The individual elements of the assessment are met or not as follows: Score 1 • Not met: Women's Rights • Not met: Children's Rights • Not met: Migrant worker's rights: The company requires its suppliers to conform to the RBA Code of Conduct which contains a commitment to migrant workers rights. However there is no evidence of this commitment in the company's own Code of Conduct. • Met: Expecting suppliers to respect these rights: The company indicates that it requires all its suppliers to meet or exceed the RBA Code of Conduct, the RBA code contains the following commitment to migrant workers rights "Participants are committed to uphold the human rights of workers, and to treat them with dignity and respect as understood by the international community. This applies to all workers including…migrant…and any other type of worker." [Human Rights Principles, Nov 2017: intel.com] Score 2 • 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	The individual elements of the assessment are met or not as follows: Score 1 • Met: Commits to stakeholder engagement: The Company states in its CSR 2017 that it is 'committed to operating with transparency and, through open and direct communication, we work to develop trusted relationships with all stakeholders, including employees, customers, suppliers, governments, and communities.' [CSR Report 2018, 2019: csrreportbuilder.intel.com] • Met: Regular stakeholder engagement: It also indicates that it uses the following methods to 'identify priority topics and emerging issues from our stakeholders': CSR and social media channels; ESG investor outreach meetings; Results of community advisory panels and surveys; Customer data requests and survey data; Employee open forums and surveys; Meetings with governments; Human rights impact assessment and ethics and compliance processes; Research on external standards, trends, and frameworks. [CSR Report 2018, 2019: csrreportbuilder.intel.com] Score 2 • Not met: Commits to engage stakeholders in design • Not met: Regular stakeholder design engagement: In addition, it states: ' We use a range of methods and inputs to identify priority topics and emerging issues from our stakeholders. SOURCES: […]; Results of community advisory panels and surveys; Employee open forums and surveys; Human rights impact assessment and ethics and compliance processes; […]. We review issues and consider both the potential impact on stakeholder decisions and the impact on Intel's business and external systems.' However, it is not clear how specifically engages with affected stakeholders to inform human rights approach or monitoring. [CSR Report 2018, 2019: csrreportbuilder.intel.com]
A.1.5	Commitment to remedy	0	The individual elements of the assessment are met or not as follows: Score 1 • Not met: Commits to remedy: In its Human Rights Principles document, the Company states: 'We have put in place formal grievance and remedy processes to enable anyone, including employees, employees of Intel's suppliers, and other external stakeholders, to report human rights concerns through our third-party-operated ethics reporting portal. We will promptly investigate allegations and pursue action to mitigate any adverse human rights impacts.' However, the commitment to remedy is not clear in terms of remedying any adverse impacts that it has caused or contributed to, as it seems to focus on reports made through the grievance mechanisms. [Human Rights Principles, Nov 2017: intel.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			Score 2 • Not met: Not obstructing access to other remedies • Not met: Collaborating with other remedy initiatives • Not met: Work with ICT suppliers to remedy impacts
A.1.6	Commitment to respect the rights of human rights defenders	0	The individual elements of the assessment are met or not as follows: Score 1 • Not met: Zero tolerance attacks on HRs Defenders (HRDs) Score 2 • 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	0.5	The individual elements of the assessment are met or not as follows: Score 1 • Not met: CEO or Board approves policy • Met: Board level responsibility for HRs: In its CSR 2018, the Company indicates: 'Since 2003, the Board's Corporate Governance and Nominating Committee has been responsible for reviewing and reporting to the Board on corporate responsibility and sustainability issues at Intel. The feedback we receive through our investor outreach activities is communicated to the Committee on a regular basis throughout the year, and to our full Board once a year. The Committee receives formal updates at least twice each year on the company's corporate responsibility performance, including a review of the annual Corporate Responsibility Report and specific corporate responsibility issues such as political contributions, climate change, human capital and workforce, and human rights issues'. The CSR 2018 includes specific sections about human rights issues, as the following: ' Respecting Human Rights', 'Combating Forced and Bonded Labor' or Responsible Mineral Sourcing'. [CSR Report 2018, 2019: csrreportbuilder.intel.com] Score 2 • Not met: Speeches/letters by Board members or CEO
A.2.2	Board discussions	1	The individual elements of the assessment are met or not as follows: Score 1 • Met: Board/Committee review of salient HRs: In its 2019 Proxy Statement, the Company indicates: 'During the past year, the Corporate Governance and Nominating Committee's oversight focused on, among other things, […], Intel's Corporate Responsibility Report and trends (including climate change, human capital and workplace, and human rights issues), […].' In addition, it says in its CR Report 2018 that 'Intel has established an integrated approach to managing human rights across our business, including board-level oversight and the involvement of senior level Management Review Committees.' Briefs including corporate responsibility performance take place twice a year (including, as mentioned in indicator A.2.1, human rights). As indicated in its charter, the committee meets at least four times each year, or more frequently. [2019 Proxy Statement, 2019: s21.q4cdn.com & CSR Report 2018, 2019: csrreportbuilder.intel.com] • Not met: Examples or trends re HR discussion: The Company states in its Anti-Slavery and Human Trafficking Statement: 'Intel has established an integrated approach to managing human rights across our business, including board-level oversight and the involvement of senior level Management Review Committees'. As indicated above, the board's committee duties and processes include human rights oversight. No details found, however, of examples of issues or trends discussed. [Anti-Slavery and Human Trafficking Statement 2018, 05/2019: intel.com] Score 2 • Not met: Both examples and process
A.2.3	Incentives and performance management	0	The individual elements of the assessment are met or not as follows: Score 1 • Not met: Incentives for at least one board member • Not met: At least one key ICT HR risk, beyond employee H&S Score 2 • 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	2	The individual elements of the assessment are met or not as follows: Score 1 • Met: Commits to ILO core conventions: See indicator A.1.2. The Company is committed to UNGC. • Met: Senior responsibility for HR: In its CR 2018, the Company indicates: 'We have established cross-functional Management Review Committees (MRCs) consisting of senior executives who manage corporate responsibility and sustainability activities across the organization. Our global Corporate Responsibility Office acts as an internal adviser to the business groups and MRCs to drive strategic alignment and incorporate external stakeholder input into decision processes'. Sustainability and corporate responsibility include human rights. [CSR Report 2018, 2019: csrreportbuilder.intel.com] Score 2 • Met: Day-to-day responsibility: In addition, the Company indicates that 'responsibility is also embedded across the company through a cross-Intel Human Rights Steering Group and close partnerships with global teams that develop and implement policies and actions related to our human rights risks'. Moreover, the Company discloses further information in its Salient Human Rights Risk Mapping Report, where it shows how each of its salient human rights risks is integrated into its value chain and is overseen by the most relevant business unit. [CSR Report 2018, 2019: csrreportbuilder.intel.com & CR 2018 - Salient Human Rights Risk Mapping: intel.com] • Met: Day-to-day responsibility for ICT in supply chain: The Salient Human Rights Risks Mapping Report, include issues related to Supply Chain, such as: force labor, legal wages, working hours or mineral from conflict affected and high-risk areas. In this document, the Company discloses the units/teams in charge to implement its policy commitments for each one of the issues. For instance, to face the 'Force Labor' risks, the Company applies the Intel Corporation Anti-Slavery and Human Trafficking Statement and the Responsible Business Alliance (RBA) Commitment Letter through the following teams: Corporate Responsibility Office, Employment Labor and Benefits, Global Supply Management, Government, Markets, and Trade Group, Legal. [CR 2018 - Salient Human Rights Risk Mapping: intel.com]
B.1.2	Incentives and performance management	2	The individual elements of the assessment are met or not as follows: Score 1 • Met: Senior manager incentives for human rights: In its 2018 CR Report, the Company states: 'Since 2008, we have linked a portion of our executive and employee compensation to corporate responsibility factors in our Annual Performance Bonus (APB). The formula for determining APB pay-outs is based on both absolute and relative financial performance and the achievement of certain operational goals. In 2018, the operational goals component included metrics related to our diversity and inclusion objectives.' In addition, according to its 2019 Proxy Statement the operational performance component represents 50% of the annual incentive cash pay-out formula and is based on specific operational goals that the committee approves for each business unit'. [CSR Report 2018, 2019: csrreportbuilder.intel.com & 2019 Proxy Statement, 2019: s21.q4cdn.com] • Met: At least one key ICT HR risk, beyond employee H&S: See above. The target depends on the average of 10 business units' scores, subject to any adjustment for performance against corporate-level diversity and inclusion goal, which was: 'to achieve full representation of women and underrepresented minorities in our U.S. workforce in 2018. Women's rights is one of the key industry risks for the 2019 Benchmark. [2019 Proxy Statement, 2019: s21.q4cdn.com] Score 2 • Met: Performance criteria made public: See above. [2019 Proxy Statement, 2019: s21.q4cdn.com]
B.1.3	Integration with enterprise risk management	1	The individual elements of the assessment are met or not as follows: Score 1 • Met: HR risks is integrated as part of enterprise risk system: In its Annual Report 2018, the Company identifies its risks, including: '[…] our operations and our financial results, including our ability to manufacture, assemble and test, design, develop, or sell products, and the demand for our products, may be adversely affected by a number of global and regional factors outside of our control. […] including: […]; differing employment practices and labor issues; […].' ; 'We face supply chain risks. […] increased regulation or stakeholder expectations regarding

Indicator Code	Indicator name	Score (out of 2)	Explanation
			responsible sourcing practices could cause our compliance costs to increase or result in publicity that negatively affects our reputation. Moreover, given that we use many materials in the manufacturing of our products and rely on many suppliers to provide these materials, but do not directly control the procurement or employment practices of such suppliers, we could be subject to similar financial or reputational risks as a result of our suppliers' conduct. […] We are subject to risks associated with environmental, health, and safety regulations and climate change. The manufacturing and assembly and test of our products require the use of hazardous materials that are subject to a broad array of environmental, health, and safety laws and regulations.' [2018 Annual Report, 2019: s23.q4cdn.com] Score 2 • Not met: Audit Ctte or independent risk assessment
B.1.4.a	Communication /dissemination of policy commitment(s) within Company's own operations	1	The individual elements of the assessment are met or not as follows: Score 1 • Met: Commits to ILO core conventions: See indicator A.1.2. The Company is committed to the UNGC. • Met: Communicates its policy to all workers in own operations: In its CR 2018 the Company indicates: 'Each year, our CEO communicates with all employees and managers about the importance of ethics and legal compliance. This "tone from the top"—reiterated by our senior leadership and combined with our annual ethics and compliance training, regular communications throughout the year, bi-annual ethics culture surveys and awareness trainings, and educational resources on our employee intranet site—helps to create an ethical and legally compliant culture. […] All employees are expected to complete annual Code of Conduct training, through which they also certify adherence to the Code.' The Global Human Rights Principles 'is referenced in the Intel Code of Conduct and is included in the corresponding annual employee training materials. [Human Rights Principles, Nov 2017: intel.com & CSR Report 2018, 2019: csrreportbuilder.intel.com] Score 2 • Not met: Commits to all 4 ILO core conventions: See indicator A.1.2 • Not met: Communication of policy commitments to stakeholder: Although the Company discloses information about its system to engage with stakeholders, and it maintain online channels to publish different documents with its policy commitments and initiatives, CHRB could not find proactive communication activities showing how it communicates its policy commitment to affected stakeholders including local communities. [CSR Report 2018, 2019: csrreportbuilder.intel.com] • Not met: How policy commitments are made accessible to audience
B.1.4.b	Communication /dissemination of policy commitment(s) to business relationships	0.5	The individual elements of the assessment are met or not as follows: Score 1 • Not 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 CSR 2018, the Company indicates: 'We expect our suppliers and their suppliers to comply with the Intel Code of Conduct and the Responsible Business Alliance Code of Conduct (RBA Code). The RBA Code describes industry environmental, social, and ethical standards, and is consistent with our Human Rights Principles and the Intel Code of Conduct. For more, read our RBA Commitment Letter. […] We communicate our expectations in our supplier contracts and request-for-proposal documents, on our supplier website, at meetings and training events, and in annual letters to suppliers.' The Company indicates in its Code of Conduct: 'We expect our suppliers to comply with all applicable laws and regulations, Intel's Code of Conduct and the Corporate Responsibility Principles consistent with the Responsible Business Alliance (RBA) Code of Conduct. We expect our suppliers to hold their direct supply chain accountable to these expectations.' [Code of Conduct, Jan 2019: intel.com & CSR Report 2018, 2019: csrreportbuilder.intel.com] Score 2 • Met: How HR commitments made binding/contractual: See above [CSR Report 2018, 2019: csrreportbuilder.intel.com] • Not met: Including on ICT suppliers
B.1.5	Training on Human Rights	0.5	The individual elements of the assessment are met or not as follows: Score 1 • Not met: Scores at least 1 on A.1.2: See indicator A.1.2 • Met: Trains all workers on HR policy commitments: In its CSR 2018 the Company indicates: 'Each year, our CEO communicates with all employees and senior managers about the importance of ethics and legal compliance. This "tone from the top"—reiterated by our senior leadership and combined with our annual ethics and compliance training, regular communications throughout the year, bi-annual ethics culture surveys and awareness trainings, and educational resources on our

Indicator Code	Indicator name	Score (out of 2)	Explanation
			employee intranet site—help to create an ethical and legally compliant culture. […] All employees are expected to complete annual Code of Conduct training, through which they also certify adherence to the Code.' The Global Human Rights Principles 'is referenced in the Intel Code of Conduct and is included in the corresponding annual employee training materials. [Human Rights Principles, Nov 2017: intel.com & CSR Report 2018, 2019: csrreportbuilder.intel.com] • Not met: Trains relevant ICT managers including procurement Score 2 • Not met: Score of 2 on A.1.2: See indicator A.1.2 • Not met: Both requirements under score 1 met
B.1.6	Monitoring and corrective actions	0.5	The individual elements of the assessment are met or not as follows: Score 1 • Not met: Scores at least 1 on A.1.2: See indicator A.1.2 • Met: Monitoring implementation of HR policy commitments: In its 2018 CR Report the Company says: 'We hold ourselves accountable to meet or exceed the same standards that we set for our suppliers, and audit ourselves to the same protocols. In 2018, our facilities in Penang, Malaysia and Ho Chi Minh City, Vietnam were audited using the RBA Validated Assessment Process (VAP). Each site received an overall perfect score of 200. In addition, our Kulim, Malaysia facility that was audited in 2017 received a perfect score following a closure audit in 2018.' [CSR Report 2018, 2019: csrreportbuilder.intel.com] • Met: Monitoring ICT suppliers: The Company indicates in its 2018 CSR 2018: 'Supplier assessments and audits cover more than 300 environmental, safety, and human rights factors, and help us determine a supplier's risk profile. The audits, conducted by a mix of third parties and Intel personnel, follow the RBA VAP and help us identify where immediate action is needed and where longer-term, corrective "targeted action plans" should be put in place. Environmental, social, and governance criteria are also incorporated into Intel Quality Assessment audits to achieve broader reach.' [CSR Report 2018, 2019: csrreportbuilder.intel.com] Score 2 • Not met: Score of 2 on A.1.2: See indicator A.1.2 • Met: Describes corrective action process: In addition, the Company indicates: 'When suppliers do not make sufficient progress in addressing audit findings or have particularly egregious issues, we require that they develop and obtain Intel's approval on "get-well action plans." Suppliers' progress is reviewed quarterly until we have verified that all significant issues have been closed, and that processes have been put in place to prevent recurrence. If satisfactory progress is not made, we may take additional action, such as not awarding new business ("conditional use" status) until issues are resolved or—when necessary—ending the supplier relationship. […] Throughout 2018, eight suppliers were on targeted action plans. By the end of the year, all suppliers had published corrective action plans and made significant progress toward meeting commitment milestones.' [CSR Report 2018, 2019: csrreportbuilder.intel.com] • Met: Example of corrective action: The Company includes some Supplier experiences in its CR Report 2017: 'Hoya Electronics has worked with Intel on ensuring compliance at our factories in Malaysia and Singapore. In Malaysia, we repaid worker recruitment fees and returned passports to our foreign contract workers. These workers are much happier now as they feel they have been treated equally to other employees who did not have to pay to secure employment. […] At the Singapore site, we ensure that migrant workers do not need to pay any fees to a recruitment agency and we have received a positive response from workers on these changes. In addition, by implementing tight control and close monitoring of working hours of our employees, we are able to ensure that our employees do not overwork.' While in last year CR Report, it indicates: 'In 2017, we required that 17 of our suppliers who employ foreign and migrant workers embark on deep analyses of their risk-management approaches. The process includes an audit of at least one recruiting agent per supplier. Thus far, five audits have been conducted, with positive results overall. Suppliers are addressing common findings such as inconsistent communications, monitoring, and management systems.' [Corporate Responsibility Report 2017, 2018: csrreportbuilder.intel.com & CSR Report 2018, 2019: csrreportbuilder.intel.com] • Not met: Discloses % of ICT supply chain monitored: The Company discloses information about the number of suppliers monitored (RBA VAP Audits, Intel RBA-Based Target Audits, Intel Quality Audits with Sustainability Element), however it is not clear the proportion of its supply chain that these figures represent. [CSR Report 2018, 2019: csrreportbuilder.intel.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.7	Engaging business relationships	1	The individual elements of the assessment are met or not as follows: Score 1 • Not met: HR affects ICT selection of suppliers: The Company indicates that it conducts assessment for new suppliers: 'A short survey is sent to new suppliers to determine whether a facility is of potential high risk. We work with suppliers during the on-boarding process to remedy any issues identified.' However, it is not clear how human rights performance is taken into account in the identification or selection of suppliers. [CSR Report 2018, 2019: csrreportbuilder.intel.com] • Met: HR affects on-going ICT supplier relationships: In addition, it adds: 'When suppliers do not make sufficient progress in addressing audit findings or have particularly egregious issues, we require that they develop and obtain Intel's approval on "get-well action plans." Suppliers' progress is reviewed quarterly until we have verified that all significant issues have been closed, and that processes have been put in place to prevent recurrence. If satisfactory progress is not made, we are prepared to take additional action, such as not awarding new business ("conditional use" status) until issues are resolved, or ending the supplier relationship.' [CSR Report 2018, 2019: csrreportbuilder.intel.com] Score 2 • Not met: Both requirement under score 1 met • Not met: Working with ICT suppliers to improve performance
B.1.8	Approach to engagement with potentially affected stakeholders	0	The individual elements of the assessment are met or not as follows: Score 1 • Not met: Stakeholder process or systems: The Company indicates that it is 'We are committed to operating with transparency and, through open and direct communication, we work to develop trusted relationships with all stakeholders, including employees, customers, suppliers, governments, and communities. We maintain formal management systems to engage with, listen to, and learn from our stakeholders and incorporate their input into our thinking and planning.' However, no evidence found describing how it identifies affected and potentially affected stakeholders and engaged with them in human rights issues in last two years. [CSR Report 2018, 2019: csrreportbuilder.intel.com] • Not met: Frequency and triggers for engagement: The Company lists examples of the methods used to stakeholder engagement: 'CSR online and social media channels; ESG investor outreach meetings; Results of community advisory panels and surveys; Customer data requests and survey data; Employee open forums and surveys; Meetings with governments; Human rights impact assessment and ethics and compliance processes; Research on external standards, trends, and frameworks'. However, there is no further information describing the frequency and triggers for engagement on human rights issues. [CSR Report 2018, 2019: csrreportbuilder.intel.com] • Not met: Workers in ICT SC engaged • Not met: Communities in the ICT SC engaged Score 2 • Not met: Analysis of stakeholder views and company's actions on them: The Company discloses a list of issues identified in its stakeholder engagement process: 'Topics and concerns raised by our stakeholders include those related to our business, such as financial performance, business strategy, taxes and incentives, political accountability, human rights, and data security. Stakeholders also raise topics related to the environment, including climate change, water conservation, air emissions, materials and chemical usage, and biodiversity. Other issues of concern for stakeholders relate to our supply chain, including conflict minerals, forced and bonded labor, and supplier audits; diversity, including LGBTQ rights and pay equity; and social impact, including support for youth technology skills, and community engagement.' The Company indicates that after the identification process it prioritizes, reviews and takes actions: 'We review priority issues with internal and external groups and use this information to inform changes to our strategies, goals, and ongoing engagement and disclosure practices.' However, there is no further information describing specific actions taken in order to implement the issues found. No new relevant evidence found in latest report. [Corporate Responsibility Report 2017, 2018: csrreportbuilder.intel.com]

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	1.5	The individual elements of the assessment are met or not as follows: Score 1 • Met: Identifying risks in own operations: In its CSR 2018, the Company indicates: 'In 2016, we engaged a third party to conduct a human rights impact assessment (HRIA) to review our processes and validate our human rights risks. The HRIA confirmed that we were addressing our most salient human rights risks, and reaffirmed our need to assess potential risks associated with emerging technologies. In 2018, we built on the results of that assessment and conducted an additional internal Artificial Intelligence and Autonomous Driving HRIA, including assessment of potential risks related to product misuse, algorithmic bias, algorithmic transparency, privacy infringement, limits on freedom of expression, and health and safety. To begin addressing these challenges, in 2018 we formed an internal AI Ethics and Human Rights team and co-hosted a Business and Human Rights AI roundtable that brought together leading technology companies to improve learning about potential human rights risks related to emerging technologies'. In 2017 report it also indicated that In response to the HRIA, in 2017: We launched a Human Rights Steering Group responsible for reinforcing Intel's culture of respecting human rights corporate-wide. The group meets quarterly or as necessary to develop strategies to avoid contributing to human rights abuse through our operations, supply chain, and products; consider emerging issues; and address any violations as they occur; We engaged human rights experts to facilitate a cross-functional workshop to enable us to more effectively identify and manage the potential human rights impacts of emerging technologies'. [CSR Report 2018, 2019: csrreportbuilder.intel.com & Corporate Responsibility Report 2017, 2018: csrreportbuilder.intel.com] • Met: Identifying risks in ICT suppliers: See above. [CSR Report 2018, 2019: csrreportbuilder.intel.com] Score 2 • Met: Ongoing global risk identification: See above [CSR Report 2018, 2019: csrreportbuilder.intel.com] • Not met: In consultation with stakeholders • Met: In consultation with HR experts: See above [CSR Report 2018, 2019: csrreportbuilder.intel.com] • Not met: Triggered by new circumstances
B.2.2	Assessing: Assessment of risks and impacts identified (salient risks and key industry risks)	1	The individual elements of the assessment are met or not as follows: Score 1 • Not met: Salient risk assessment (and context): In its CSR 2018, the Company indicates: 'In 2016, we engaged a third party to conduct a human rights impact assessment (HRIA) to review our processes and validate our human rights risks. The HRIA confirmed that we were addressing our most salient human rights risks, and reaffirmed our need to assess potential risks associated with emerging technologies. In 2018, we built on the results of that assessment and conducted an additional internal Artificial Intelligence and Autonomous Driving HRIA, including assessment of potential risks related to product misuse, algorithmic bias, algorithmic transparency, privacy infringement, limits on freedom of expression, and health and safety. To begin addressing these challenges, in 2018 we formed an internal AI Ethics and Human Rights team and co-hosted a Business and Human Rights AI roundtable that brought together leading technology companies to improve learning about potential human rights risks related to emerging technologies.' However, no evidence found on how different factors were taken into account, such as geographical, economic, social or other factors. [CSR Report 2018, 2019: csrreportbuilder.intel.com] • Met: Public disclosure of salient risks: The Company discloses its salient human rights issues in its CSR 2018: 'Discrimination; Forced Labor; Freedom of Expression and Privacy; Health and Safety; Living wages; Raw minerals; Water; Working Hours' [CSR Report 2018, 2019: csrreportbuilder.intel.com] Score 2 • Not met: Both requirements under score 1 met
B.2.3	Integrating and Acting: Integrating assessment findings internally and taking	1	The individual elements of the assessment are met or not as follows: Score 1 • Not met: Action Plans to mitigate risks: The Company states in its CR Report 2018: 'To begin addressing these challenges, in 2018 we formed an internal AI Ethics and Human Rights team and co-hosted a Business and Human Rights AI roundtable that brought together leading technology companies to improve learning about potential human rights risks related to emerging technologies.' However, no further information found about the steps taken / Action Plan designed to face the

Indicator Code	Indicator name	Score (out of 2)	Explanation
	appropriate action		human rights risks identified and assessed. [CSR Report 2018, 2019: csrreportbuilder.intel.com] • Not met: Including in ICT supply chain • Met: Example of Actions decided: In addition, it indicates: 'In 2017, we required that 17 of our suppliers who employ foreign and migrant workers embark on deep analyses of their risk-management approaches. The process includes an audit of at least one recruiting agent per supplier. Thus far, five audits have been conducted, with positive results overall. Suppliers are addressing common findings such as inconsistent communications, monitoring, and management systems. As a result of these efforts, we have pinpointed risks deeper in our supply chain. In 2018, we identified risks and gaps in the areas of construction and packaging, and are now looking more broadly at suppliers in those areas. We also required that approximately 50 of our suppliers work with at least three of their own major suppliers to assess and address their risks of forced and bonded labor. Our work at this tier 2 level has resulted in changes to supplier policies and procedures, and stronger engagements with recruiting and labor agents. We have uncovered and are now addressing a number of issues, including fees and passport holding.' [CSR Report 2018, 2019: csrreportbuilder.intel.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 • 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	0.5	The individual elements of the assessment are met or not as follows: Score 1 • Met: Comms plan re identifying risks: See indicator B.2.1. The Company has describes system to identify risks in both own operations and supply chain. This is on going and includes human rights expert consultation. • 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 • 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: The Company indicates in its Global Human Rights Principles that it has 'put in place formal grievance and remedy processes to enable anyone, including employees, employees of Intel's suppliers, and other external stakeholders, to report human rights concerns through our third-party-operated ethics reporting portal.' [Human Rights Principles, Nov 2017: intel.com] Score 2 • Not met: Number grievances filed, addressed or resolved • Met: Channel is available in all appropriate languages: Its Ethics Point Portal is available in English, Spanish and Chinese. In addition, in its Anti-Slavery and Human Trafficking Statement, the Company indicates that 'Individuals can report concerns to Intel by email, telephone, or letter, in English or their local language.' [Reporting Portal, Ap 2019: secure.ethicspoint.com & Anti-Slavery and Human Trafficking Statement 2018, 05/2019: intel.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			• Met: Expect ICT supplier to have equivalent grievance systems: The RBA Code of Conduct indicates that suppliers' management systems should contain: 'Ongoing processes, including an effective grievance mechanism, to assess employees' understanding of and obtain feedback on or violations against practices and conditions covered by this Code and to foster continuous improvement.' And it also requires that 'At a minimum, Participants shall also require its next tier suppliers to acknowledge and implement the Code.' [RBA Code of Conduct (Version 6.0), 2018: responsiblebusiness.org] • Met: Opens own system to ICT supplier workers: See above [Human Rights Principles, Nov 2017: intel.com]
C.2	Grievance channel(s)/mechanism(s) to receive complaints or concerns from external individuals and communities	2	The individual elements of the assessment are met or not as follows: Score 1 • Met: Grievance mechanism for community: The Company indicates in its Global Human Rights Principles that it has 'put in place formal grievance and remedy processes to enable anyone, including employees, employees of Intel's suppliers, and other external stakeholders, to report human rights concerns through our third-party-operated ethics reporting portal.' [Human Rights Principles, Nov 2017: intel.com] Score 2 • Met: Describes accessibility and local languages: Its Ethics Point Portal is available in English, Spanish and Chinese. In addition, in its Anti-Slavery and Human Trafficking Statement, the Company indicates that 'Individuals can report concerns to Intel by email, telephone, or letter, in English or their local language.' [Reporting Portal, Ap 2019: secure.ethicspoint.com] • Met: ICT supplier communities use global system: See above, the Company's systems are open to anyone. [Human Rights Principles, Nov 2017: intel.com]
C.3	Users are involved in the design and performance of the channel(s)/mechanism(s)	0	The individual elements of the assessment are met or not as follows: Score 1 • Not met: Engages users to create or assess system • Not met: Description of how they do this Score 2 • Not met: Engages with users on system performance • Not met: Provides user engagement example on performance • Not met: ICT suppliers consult users in creation or assessment
C.4	Procedures related to the mechanism(s)/channel(s) are publicly available and explained	0.5	The individual elements of the assessment are met or not as follows: Score 1 • Not met: Response timescales • Met: How complainants will be informed: In its Ethics Point website, the Company indicates: 'After you complete your report, you will be assigned a unique code called a "report key." Write down your report key and password and keep them in a safe place. After 5-7 business days, use your report key and password to check your report for questions. You can provide additional information at any time.' [Reporting Portal, Ap 2019: secure.ethicspoint.com] • Not met: Who is handling the complaint Score 2 • Not met: Escalation to senior/independent level
C.5	Commitment to non-retaliation over complaints or concerns made	1	The individual elements of the assessment are met or not as follows: Score 1 • Met: Public statement prohibiting retaliation: The Company states in its Global Human Rights Principles that it 'does not tolerate retaliation against anyone who in good faith reports possible violations of law, the Intel Code of Conduct, or other company policies or procedures, questions on-going or proposed conduct, or participates in an internal investigation.' [Human Rights Principles, Nov 2017: intel.com] • Met: Practical measures to prevent retaliation: In its CSR 2018, the Company indicates: 'The anonymous reporting channel consists of a telephone and online reporting tool managed by a third party. We clearly communicate Intel's non-retaliation policy, which prohibits retaliation against anyone who, in good faith, reports a concern or participates in an investigation.' [CSR Report 2018, 2019: csrreportbuilder.intel.com] Score 2 • Not met: Has not retaliated in practice • Not met: Expects ICT suppliers to prohibit retaliation
C.6	Company involvement with State-based judicial	0	The individual elements of the assessment are met or not as follows: Score 1 • Not met: Won't impede state based mechanisms • Not met: Complainants not asked to waive rights

Indicator Code	Indicator name	Score (out of 2)	Explanation
	and non-judicial grievance mechanisms		Score 2 • Not met: Will work with state based or non judicial mechanisms • Not met: Example of issue resolved (if applicable)
C.7	Remedying adverse impacts and incorporating lessons learned	1.5	The individual elements of the assessment are met or not as follows: Score 1 • Met: Describes how remedy has been provided: The Company indicates in its CR Report 2018: 'As a result of our efforts, our suppliers have returned over $14 million in fees to workers since 2014. […] Our ongoing assessments and efforts to reach deeper into the supply chain encompass more than 35,000 workers in our extended supply chain.' In addition, in its Anti-Slavery and Human Trafficking Statement 2018, it declared: 'Our due diligence continues to positively impact workers throughout the supply chain. Our suppliers have returned approximately $14 million in fees to more than 12,600 workers since 2014 and implemented new practices to ensure fee collection does not easily recur. To date, we have improved the lives of approximately 27,700 workers through fee repayments, returned passports, amended contracts, and other improvements related to anti-slavery and human trafficking'. [Anti-Slavery and Human Trafficking Statement 2018, 05/2019: intel.com & CSR Report 2018, 2019: csrreportbuilder.intel.com] Score 2 • Met: Changes introduced to stop repetition: In its 2018 CR Report, the Company states: 'As a result of our efforts, our suppliers have returned over $14 million in fees to workers since 2014. In some instances, we have faced challenges in gaining cooperation in repaying workers quickly, and we work closely with suppliers to determine acceptable gap closure plans. As we have learned more about the contributing factors to forced and bonded labor, we have adjusted our tools and processes to align with likely risks. Many challenges exist in combating this issue, in particular, lack of full visibility into our multi-tier supply chain and difficulty in tracing the multiple levels of recruiting and labor agents who source workers. Through our work on this issue, we have found that some of the agents take advantage of vulnerable workers. We believe that addressing agent risks is a critical part of eliminating the root causes of the issue. In 2017, we required that 17 of our suppliers who employ foreign and migrant workers embark on deep analyses of their risk-management approaches. The process includes an audit of at least one recruiting agent per supplier. Thus far, five audits have been conducted, with positive results overall. Suppliers are addressing common findings such as inconsistent communications, monitoring, and management systems.' [CSR Report 2018, 2019: csrreportbuilder.intel.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.a	Living wage (in own production or manufacturing operations)	0	The individual elements of the assessment are met or not as follows: Score 1 • Not met: Living wage target timeframe • Not met: Describes how living wage determined Score 2 • Not met: Achieved payment of living wage • Not met: Regularly review definition of living wage with unions
D.4.1.b	Living wage (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 • Not met: Living wage in supplier code or contracts • Not met: Improving living wage practices of suppliers Score 2 • 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	The individual elements of the assessment are met or not as follows: Score 1 • Not met: Avoids business model pressure on HRs

Indicator Code	Indicator name	Score (out of 2)	Explanation
			• Not met: Positive incentives to respect human rights: The Company indicates in its CSR 2018 the following: 'We provide regular feedback to suppliers on their achievements and progress, and integrate corporate responsibility considerations into our supplier awards and Supplier Continuous Quality Improvement (SCQI) Program. The SCQI Program recognizes suppliers that have demonstrated outstanding performance with SCQI, Preferred Quality Supplier (PQS) status, or Supplier Achievement Awards. In 2018, we continued to recognize suppliers for contributions to our supplier diversity and manufacturing safety programs.' However, it is not clear whether the awards have consequences in the Company's purchasing practices to encourages its suppliers to respect human rights. [CSR Report 2018, 2019: csrreportbuilder.intel.com] Score 2 • Not met: Both requirements under score 1 met
D.4.3	Mapping and disclosing the supply chain	0	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 CSR 2018 that 'More than 11,000 suppliers in over 90 countries provide direct materials for our production processes, tools and machines for our factories, and logistics and packaging services, office materials, and travel services for Intel. We also rely on others to manufacture, assemble, and test some of our components and products.' However, it is not clear whether suppliers, including direct and indirect suppliers, have been mapped. [CSR Report 2018, 2019: csrreportbuilder.intel.com] Score 2 • Not met: Discloses significant parts of supply chain and why
D.4.4.a	Prohibition on child labour: Age verification and corrective actions (in own production or manufacturing operations)	0.5	The individual elements of the assessment are met or not as follows: Score 1 • Met: Does not use child labour: The Company states in its Code of Conduct: 'our policies prohibit the employment of anyone under the age of 16 in any position, and worker under the age of 18 are not to perform hazardous work. [Code of Conduct, Jan 2019: intel.com] • Not met: Age verification of job applicants and workers Score 2 • Not met: Remediation if children identified
D.4.4.b	Prohibition on child labour: Age verification and corrective actions (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 • Not met: Child Labour rules in codes or contracts: The RBA Code of Conduct indicates: 'Child labor is not to be used in any stage of manufacturing.' However, there is no requirement to verify the age of job applicants and workers or to implement remediation programmes. Suppliers are required to follow this code. [RBA Code of Conduct (Version 6.0), 2018: responsiblebusiness.org] • Not met: How working with suppliers on child labour Score 2 • Not met: Both requirements under score 1 met • Not met: Provide analysis of trends demonstrating progress
D.4.5.a	Prohibition on forced labour: Debt bondage and other unacceptable financial costs (in own production or manufacturing operations)	0	The individual elements of the assessment are met or not as follows: Score 1 • Not met: Pays workers in full and on time • Not met: Payslips show any legitimate deductions Score 2 • Not met: How these practices are implemented and monitored for agencies, labour brokers or recruiters
D.4.5.b	Prohibition on forced labour: Debt bondage and other unacceptable financial costs (in the supply chain)	2	The individual elements of the assessment are met or not as follows: Score 1 • Met: Debt and fees rules in codes or contracts: The RBA Code of Conduct indicates: 'Forced, bonded (including debt bondage) or indentured labor, involuntary or exploitative prison labor, slavery or trafficking of persons shall not be used. […] Workers shall not be required to pay employers' or agents' recruitment fees or other related fees for their employment. If any such fees are found to have been paid by workers, such fees shall be repaid to the worker.' Suppliers are required to follow this code. [RBA Code of Conduct (Version 6.0), 2018: responsiblebusiness.org]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			• Met: How working with suppliers on debt & fees: In its CSR 2018, the Company indicates: 'We have worked to build a strong system to detect and address risks of forced and bonded labor among our suppliers and their recruiting and labor agents. Our Anti- Slavery and Human Trafficking Statement details the expectations we have for ourselves and our suppliers, including prohibitions against holding worker passports and charging workers fees to obtain or keep employment. As a result of our efforts, our suppliers have returned over $14 million in fees to workers since 2014. […] In 2017, we required that 17 of our suppliers who employ foreign and migrant workers embark on deep analyses of their risk-management approaches. The process includes an audit of at least one recruiting agent per supplier. Thus far, five audits have been conducted, with positive results overall. Suppliers are addressing common findings such as inconsistent communications, monitoring, and management systems. […] In 2018, we identified risks and gaps in the areas of construction and packaging, and are now looking more broadly at suppliers in those areas. We also required that approximately 50 of our suppliers work with at least three of their own major suppliers to assess and address their risks of forced and bonded labor. Our work at this tier 2 level has resulted in changes to supplier policies and procedures, and stronger engagements with recruiting and labor agents.' [CSR Report 2018, 2019: csrreportbuilder.intel.com] Score 2 • Met: Both requirements under score 1 met: See above • Met: Provide analysis of trends in progress made: The Company discloses information about the number of incidents related to risks for forced and bonded labor (2013-2017). [Corporate Responsibility Report 2017, 2018: csrreportbuilder.intel.com]
D.4.5.c	Prohibition on forced labour: Restrictions on workers (in own production or manufacturing operations)	1	The individual elements of the assessment are met or not as follows: Score 1 • Met: Does not retain documents or restrict movement: In its 2018 CR Report the Company states: 'We hold ourselves accountable to meet or exceed the same standards that we set for our suppliers, and audit ourselves to the same protocols'. It also adds: 'Our Anti-Slavery and Human Trafficking Statement details the expectations we have for ourselves and our suppliers, including prohibitions against holding worker passports and charging workers fees to obtain or keep employment'. In this document it describes these expectations including 'no holding worker's original identification; secure personal storage must be provided; workers must have freedom of movement'. [CSR Report 2018, 2019: csrreportbuilder.intel.com & Anti-Slavery and Human Trafficking Statement 2017, May 2018: intel.com] Score 2 • Not met: How sure about agencies or brokers
D.4.5.d	Prohibition on forced labour: Restrictions on workers (in the supply chain)	1.5	The individual elements of the assessment are met or not as follows: Score 1 • Met: Free movement rules in codes or contracts: The RBA Code of Conduct indicates: 'There shall be no unreasonable restrictions on workers' freedom of movement in the facility in addition to unreasonable restrictions on entering or exiting company-provided facilities.[…] All work must be voluntary and workers shall be free to leave work at any time or terminate their employment Employers and agents may not hold or otherwise destroy, conceal, confiscate or deny access by employees to their identity or immigration documents, such as government-issued identification, passports or work permits, unless such holdings are required by law.' Suppliers are required to follow this code. [RBA Code of Conduct (Version 6.0), 2018: responsiblebusiness.org] • Met: How these practices are implemented and monitored for agencies, labour brokers or recruiters: The Company states in its 2018 CR Report: 'Minimizing the risk of slavery and human trafficking in our operations and supply chain requires overcoming two notable challenges: gaining visibility into our multi-tier supply chain and tracing multiple levels of labor agents who source workers. To address these challenges, in 2017 we asked 17 suppliers who employ foreign and migrant workers (FMWs) to perform an in-depth analysis of their risk management approaches. These suppliers were required to (1) align their policies to the RBA, (2) cascade those policies to their recruiting agents, (3) map the journey of their FMWs from their home countries to factories, (4) assess the risks associated with that journey, and (5) provide action plans to close any gaps in their practices vs. our expectations, as laid out in our Antislavery and Human Trafficking Statement.' [Anti-Slavery and Human Trafficking Statement 2018, 05/2019: intel.com] Score 2 • Met: Both requirements under score 1 met • Not met: Provide analysis of trends in progress made

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.4.6.a	Freedom of association and collective bargaining (in own production or manufacturing operations)	1	The individual elements of the assessment are met or not as follows: Score 1 • Not met: Commits not to interfere with union rights and collective bargaining and prohibits intimidation and retaliation: The Company states in its Global Human Rights Principles that it 'recognizes that in many of the locations where we operate, employees have the right to freely associate or not associate with third-party organizations such as labor organizations, along with the right to bargain or not bargain collectively in accordance with local laws. Intel respects those rights and is further committed to treating our employees with dignity and respect and creating an environment of open communication […]'. However, there is no reference to measures put in place to prohibit any form of intimidation, harassment, retaliation or violence against workers seeking to exercise the rights to freedom of association and collective bargaining, and a commitment to respect these rights company-wide. The Company provided information to CHRB in relation to this subindicator, but it was not material. [Human Rights Principles, Nov 2017: intel.com] • Met: Discloses % covered by collective bargaining: The Company reports in its CR 2018 GRI Index that : 'Approximately 12% of employees are covered by a union, Works Council, or collective agreement.' [2018 GRI Index, 2019: csrreportbuilder.intel.com] Score 2 • Not met: Both requirement under score 1 met
D.4.6.b	Freedom of association and collective bargaining (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 • Not met: FoA & CB rules in codes or contracts: The RBA Code of Conduct indicates: 'In conformance with local law, participants shall respect the right of all workers to form and join trade unions of their own choosing, to bargain collectively and to engage in peaceful assembly as well as respect the right of workers to refrain from such activities. Workers and/or their representatives shall be able to openly communicate and share ideas and concerns with management regarding working conditions and management practices without fear of discrimination, reprisal, intimidation or harassment.' Suppliers are required to follow this code. 'However, it is not clear whether the Company is respecting those rights in all contexts, as it indicates 'in conformance with local law'. [RBA Code of Conduct (Version 6.0), 2018: responsiblebusiness.org] • Not met: How working with suppliers on FoA and CB Score 2 • Not met: Both requirements under score 1 met • Not met: Provide analysis of trends in progress made
D.4.7.a	Health and safety: Fatalities, lost days, injury rates (in own production of manufacturing operations)	0.5	The individual elements of the assessment are met or not as follows: Score 1 • Met: Injury Rate disclosures: The Company reports an 'Occupational Safety and Health Administration (OSHA) recordable rate of 0.69'. [CSR Report 2018, 2019: csrreportbuilder.intel.com] • Met: Lost days or near miss disclosure: The Company reports a days away case rate of 0.11 according to its CR Report 2018. [CSR Report 2018, 2019: csrreportbuilder.intel.com] • Met: Fatalities disclosures: The Company reports zero fatalities in last reporting period. [2018 GRI Index, 2019: csrreportbuilder.intel.com] • Not met: Occupational disease rates Score 2 • Met: Set targets for H&S performance: The Company indicates in its CR Report 2018 that its 'ultimate goal is to achieve zero serious injuries through continued investment in and focus on our core safety programs and injury-reduction initiatives'. [CSR Report 2018, 2019: csrreportbuilder.intel.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			• Met: Met targets or explains why not: The Company reports the following: 'Intel ended 2018 with an Occupational Safety and Health Administration (OSHA) recordable rate of 0.69 […] Our days away case rate was 0.11 […] Our First Aid to Recordable Ratio for CTDs increased from 1.7 to 1 in 2017 to 2.1 to 1 in 2018. The increases in the rates above were driven in part by our focus in 2018 on encouraging early reporting based on our review of our 2017 injury data and trends from our employee safety culture surveys […] In 2018, in recognition of the International Labor Organization's (ILO) World Day for Safety and Health at Work, we launched a comprehensive "Global Safety Always" campaign at 43 Intel sites. Our goal was to increase employee awareness of reporting, ergonomics, and situational safety using multi-media approaches and manager guidance. As a result of the campaign and other efforts, reporting of injuries—primarily CTDs—increased 20% across Intel. Our focus on a strong safety culture and encouragement of early reporting will continue to be a focus area for us in 2019.' [CSR Report 2018, 2019: csrreportbuilder.intel.com]
D.4.7.b	Health and safety: Fatalities, lost days, injury rates (in the supply chain)	0.5	The individual elements of the assessment are met or not as follows: Score 1 • Met: Sets out clear Health and Safety requirements: The RBA Code of Conduct includes health and safety requirements, including the following topics: Occupational Safety; Emergency Preparedness; Occupational Injury and Illness; Industrial Hygiene; Physically Demanding Work; Machine Safeguarding; Sanitation, Food, and Housing; and Health and Safety Communication. Suppliers are required to follow this code. [RBA Code of Conduct (Version 6.0), 2018: responsiblebusiness.org] • Not met: Injury rate disclosures • Not met: Lost days or near miss disclosures • Not met: Fatalities disclosures: The Company reports that it had zero work-related employee or onsite contractor fatalities in 2018.', however this figure does not include suppliers workers, just onsite contractors. [2018 GRI Index, 2019: csrreportbuilder.intel.com] • Not met: Occupational disease rates Score 2 • Met: How working with suppliers on H&S: In its CSR 2017, the Company indicates: 'We set high safety training and performance expectations during our contracting process and orientation for new suppliers. In 2018, we added safety assessment and additional training programs to strengthen the safety performance of all suppliers. One element of our program is to ensure that our suppliers have key global safety standards and employee safety training programs, which we evaluate annually. In 2018, we focused primarily on working with suppliers who have employees that perform potentially hazardous work at our facilities.' [CSR Report 2018, 2019: csrreportbuilder.intel.com] • Not met: Provide analysis of trends in progress made: No evidence found in relation to figures comparing performance in safety indicators for suppliers.
D.4.8.a	Women's rights (in own production or manufacturing operations)	1	The individual elements of the assessment are met or not as follows: Score 1 • Not met: Process to stop harassment and violence: The Company includes an anti-harassment provision in its Code of Conduct, however CHRB could not find a description of the processes put in place to prohibit harassment, intimidation and violence against women. [Code of Conduct, Jan 2019: intel.com] • Not met: Working conditions take account of gender • Met: Equality of opportunity at all levels: Its Code of Conduct indicates: 'We provide equal employment opportunity for all applicant and employees. […] We follow these principles in all areas of employment including recruitment, hiring, training, promotion, compensation, benefits, transfer, and social and recreational programs.' In addition, in its CR Report 2018, the Company states: 'In January 2015, we set a goal to reach full representation of women and underrepresented minorities (URMs) in Intel's U.S. workforce by 2020. The company also committed $300 million to support this goal, increasing diverse representation not just at Intel, but across the technology industry. In 2018, we achieved our goal, two years early. […] Since we set the goal, the number of URMs and women in Intel's U.S. workforce has increased for four consecutive years. Overall representation of URMs at Intel in the U.S. is now at 14.6%. Since 2015, our U.S. technical female population has increased 3.8%, to 23.9%. We also achieved an increase among our U.S. leadership, with an increase from 17.7% to 20.7% for females and from 6.3% to 9.2% for URMs'. In addition, the Company reports that it achieved gender pay equity globally. [Intel achieves gender pay equity globally, 09/2019: newsroom.intel.com & CSR Report 2018, 2019: csrreportbuilder.intel.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			Score 2 • Not met: Meets all of the requirements under score 1
D.4.8.b	Women's rights (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 • Not met: Women's rights in codes or contracts: The RBA Code of Conduct indicates: 'Reasonable steps must also be taken to remove pregnant women/nursing mothers from working condition with high hazards, remove or reduce any workplace health and safety risks to pregnant women and nursing mothers including those associated with their work assignments, as well as include reasonable accommodations for nursing mothers.' However, no evidence found on measures to ensure equal opportunities throughout all levels of employment . [RBA Code of Conduct (Version 6.0), 2018: responsiblebusiness.org] • Not met: How working with suppliers on women's rights: The Company indicates in its 2018 CR Report: 'Inclusion of diverse-owned suppliers is built into our operations, and outlined in our Supplier Diversity Policy. We have integrated requirements for including diverse suppliers into our supplier bidding, selection, and management processes, and in our Supplier Continuous Quality Improvement (SCQI) award. We apply these expectations and requirements to tier 1 suppliers, and we also expect our non-diverse suppliers to report their own spending with diverse-owned suppliers and subcontractors. We continued to see an increase in overall tier 2 diverse spends reporting, with a 29% increase from 2017 to 2018. […] In 2017, Intel made a commitment to spend $100 million with women-owned businesses around the world by 2020. We reached our goal more than a year ahead of schedule, and in December 2018, doubled our commitment at the Global Citizen Festival to spend $200 million with women-owned businesses by 2020 globally.' [CSR Report 2018, 2019: csrreportbuilder.intel.com] Score 2 • Not met: Both requirement under score 1 met • Not met: Provide analysis of trends in progress made
D.4.9.a	Working hours (in own production or manufacturing operations)	0	The individual elements of the assessment are met or not as follows: Score 1 • Not met: Respects max hours, min breaks and rest periods in its own operations: The Company indicates in its Global Human Rights Principles that 'Working hours are not to exceed the maximum set by local law or no more than 60 hours per week, whichever is stricter. Workers should not work longer than 6 consecutive days without at least one day off.' However, no evidence found of references to international standards, standard weekly hours. [Human Rights Principles, Nov 2017: intel.com] Score 2 • Not met: How it implements and checks this
D.4.9.b	Working hours (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 • Not met: Working hours in codes or contracts: The RBA Code of Conduct indicates: 'Working hours are not to exceed the maximum set by local law. Further, a workweek should not be more than 60 hours per week, including overtime, except in emergency or unusual situations. Workers shall be allowed at least one day off every seven days.' Suppliers are required to follow this code. On the other hand, the Company indicates in its CR Report 2018 that 'We hold ourselves accountable to meet or exceed the same standards that we set for our suppliers, and audit ourselves to the same protocols. In 2018, our facilities in Penang, Malaysia and Ho Chi Minh City, Vietnam were audited using the RBA Validated Assessment Process (VAP).'; and with respect to suppliers audit process it states: 'The audits, conducted by a mix of third parties and Intel personnel, follow the RBA VAP'. The VAP Manual defines emergency or unusual situations where the working hours limit could be exceeded. However, no evidence found of references to international standards, standard weekly hours. [RBA Code of Conduct (Version 6.0), 2018: responsiblebusiness.org & CSR Report 2018, 2019: csrreportbuilder.intel.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			• Not met: How working with suppliers on working hours: The Company indicates in its CSR 2018: 'Our complimentary Supplier Sustainability Resource Center […] has information on 19 critical topics, such as management systems, working hours, social insurance in China, RBA Code changes, and lean manufacturing. We delivered 20 webinars in three languages through the Resource Center in 2018. The center's user feedback feature enables direct, two-way dialogue, resulting in new insights about critical sustainability topics. In 2018, we enrolled 648 new users to the Resource Center, raising the total number of registered users to approximately 2,900. Since launching in 2015, we have seen an average increase of 80% in supplier participation in our Sustainability webinar series each year.' However, it is not clear whether the webinars are dedicated to 'working hours' training. [CSR Report 2018, 2019: csrreportbuilder.intel.com] Score 2 • Not met: Both requirements under score 1 met • Not met: Provide analysis of trends in progress made
D.4.10.a	Responsible Mineral Sourcing: Arrangements with Suppliers and Smelters/Refiners in the Mineral Resource Supply Chains	0.5	The individual elements of the assessment are met or not as follows: Score 1 • Met: Responsible mineral sourcing due diligence in suppler contracts: The Responsible sourcing minerals policy requires suppliers to 'Establish and maintain a publicly available policy on responsible mineral sourcing that aligns with the OECD Guidance'; Establish due diligence frameworks and management systems consistent with the OECD Guidance'. The Company indicates in its Conflict minerals disclosure that 'feature requirements related to conflict minerals in our standard template for supplier contracts and specifications so that current and future suppliers are obligated to comply with our policies on conflict minerals, including participation in a supply chain survey and related due diligence activities. We communicate our Conflict Minerals Sourcing Policy and contractual requirements to relevant suppliers annually'. [Conflict Mineral Report 2018 (Form SD), 16/05/2019: intel.com & Anti-Slavery and Human Trafficking Statement 2017, May 2018: intel.com] • Not met: Builds capacity with smelters/refiners: The Company states that 'Since 2009, [it] visited 111 different smelter and refiner facilities in 23 countries with the goal of providing education on conflict minerals, collecting country of origin information of the conflict minerals in our supply chain, and encouraging participation in the Responsible Minerals Assurance Process (RMAP), […]'. In addition, it indicates in its 2018 Form SD: 'If a smelter or refiner in our supply chain was not yet conformant to a responsible mineral sourcing validation program or had not yet begun participation in such a program, Intel and other RMI member companies proactively attempted to contact such facilities to request country of origin information for the conflict minerals the facilities processed, as well as to encourage and assist their participation in a responsible mineral sourcing validation program and, in some cases, visited such facilities on-site.' No evidence found, however, about details of capacity building in suppliers. Although it works with one supplier in capacity building to ensure accuracy of future declarations, no further work carried out with suppliers found in capacity building. [Conflict Mineral - White Paper, 05/2019: intel.com & Conflict Mineral Report 2018 (Form SD), 16/05/2019: intel.com] Score 2 • Met: Disclosure of smelter information in supplier requirements: As indicated above 'purchase agreements and/or purchase order terms and conditions require suppliers to represent warrant compliance with Intel's code of conduct, the RBA Code of Conduct, […]'. The RBA Code states that 'participants shall exercise due diligence on the source and chain of custody of these minerals and make their due diligence measures available to customers upon customer request'. [RBA Code of Conduct (Version 6.0), 2018: responsiblebusiness.org] • Not met: Responsible conflict mineral sourcing covers all minerals

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.4.10.b	Responsible Mineral Sourcing: Risk Identification in Mineral Supply Chain	0.5	The individual elements of the assessment are met or not as follows: Score 1 • Not met: Risk identification and disclosure in line with OECD Guidance: The Company states in its CSR 2018 that is uses the information of the smelter/refiners identification process (See below) to identify potential mineral supply-chain risks. In addition, in its document 'Efforts to achieve a Conflict Free , the Company indicates that 'Since 2009, we have visited 109 different smelter and refiner facilities in 23 different countries. Such visits help identify risks, [...] and drive risk mitigation for human rights impacts'. The Company states that it 'Performed risk mitigation effort with surveyed suppliers we identified as not in conformity with our conflict minerals policy or contractual requirements by working with them to bring them into compliance'. However, there is no further information about the risks identified. [CSR Report 2018, 2019: csrreportbuilder.intel.com & Efforts to achieve a Conflict Free Supply Chain - White Paper, May 2018: intel.com] • Met: Identification of smelter/refiners and OECD due diligence: In its CSR 2017, the Company indicates: 'Each year we conduct a supply chain survey to identify the smelters and refiners that process the metal contained in the products supplied to Intel, and the country of origin and trade of minerals used. We then compare those smelters and refiners to the list of facilities that conform to a responsible minerals sourcing validation program such as the RMI's Responsible Minerals Assurance Process (RMAP). [...].' In addition, the Company states in its document 'Efforts to achieve Conflict Free: 'We also evaluate whether a supplier meets our conflict minerals policy or contractual requirements based on information included in the CMRT.' [CSR Report 2018, 2019: csrreportbuilder.intel.com & Efforts to achieve a Conflict Free Supply Chain - White Paper, May 2018: intel.com] Score 2 • Met: Discloses smelters/refiners judged in line with OECD due diligence: The Company discloses the list of all its smelters/refiners in its supply chain which have been validated. [Conflict Mineral Report 2018 (Form SD), 16/05/2019: intel.com] • Not met: Responsible conflict mineral sourcing covers all minerals
D.4.10.c	Responsible Mineral Sourcing: Risk Management in the Mineral Supply Chain	1	The individual elements of the assessment are met or not as follows: Score 1 • Met: Describes mineral risk management plan for supply chain: Risk management plan include 'perform risk mitigation efforts to bring suppliers into conformity with our policy or contractual requirements, which efforts may include working directly with suppliers to consider an alternative source for the necessary conflict minerals. Attempt to contact smelter and refiner facilities that are not conformant to a responsible mineral sourcing validation program to assess their due diligence practices, request country of origin and chain of custody information for the conflict minerals processed by the facilities and encourage and assist in their participation in such a program'. [Conflict Mineral Report 2018 (Form SD), 16/05/2019: intel.com] • Met: Monitoring, tracking and whether better risk prevention/mitigation over time: The Company reports in its Form SD 2018 about the measures performed during last reporting year: 'Monitored and tracked surveyed suppliers, and smelters and refiners identified by surveyed suppliers, which we identified as not meeting our conflict minerals policy or contractual requirements, to determine their progress in meeting those requirements. Performed risk mitigation effort with surveyed suppliers we identified as not in conformity with our conflict minerals policy or contractual requirements by working with them to bring them into compliance. In 2018, visited 2 smelters and refiners that were not conformant with a responsible mineral sourcing validation program to collect country of origin information and encouraged and assist their participation in such program. Provided 12 progress reports to TMG senior management and 2 progress reports to our CEO that summarized the status of our conflict mineral program.' [Conflict Mineral - White Paper, 05/2019: intel.com] Score 2 • Not met: Supplier and stakeholders engaged in risk management strategy • 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		No allegations meeting the CHRB severity threshold were found, and so the score of 28.68 out of 80 points scored in themes A-D & F has been applied to produce a score of 7.17 out of 20 points for theme E.

F. Transparency (10% of Total)

Indicator Code	Indicator name	Score	Explanation
F.1	Company willingness to publish information	2.69 out of 4	Out of a total of 52 indicators assessed under sections A-D of the benchmark, Intel Corporation made data public that met one or more elements of the methodology in 35 cases, leading to a disclosure score of 2.69 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 • Met: Company reports on GRI: The Company reports on GRI according to its GRI Index CSR 2018 document. [2018 GRI Index, 2019: csrreportbuilder.intel.com]
F.3	Key, High Quality Disclosures	0.4 out of 4	Intel Corporation met 1 of the 10 thresholds listed below and therefore gets 0.4 out of 4 points for the high quality disclosure indicator. Specificity and use of concrete examples • 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 • 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 Demonstrating a forward focus • Not met: Score 2 for A.2.3 : Incentives and performance management • Met: Score 2 for B.1.2 : Incentives and performance management • Not met: Score 1 for D.4.1.a: Living wage (in own production or manufacturing operations) • Not met: Score 2 for D.4.7.a: Health and safety: Fatalities, lost days, injury rates (in own production of manufacturing operations)

Disclaimer

and Wales.

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.