

Company Name Micron Technology
Industry ICT (Own operations and Supply Chain)
Overall Score (*) 19.2 out of 100

Theme Score	Out of	For Theme
2.2	10	A. Governance and Policies
3.1	25	B. Embedding Respect and Human Rights Due Diligence
3.8	15	C. Remedies and Grievance Mechanisms
2.2	20	D. Performance: Company Human Rights Practices
3.8	20	E. Performance: Responses to Serious Allegations
4.0	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 <ul style="list-style-type: none"> Met: General HRs commitment: The Company states 'We are strongly committed to respecting and protecting human rights wherever we operate.' [Code of Business Conduct and Ethics, 8/2018: micron.com] Score 2 <ul style="list-style-type: none"> Not met: UNGPs Not met: OECD
A.1.2	Commitment to respect the human rights of workers	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: ILO Core: The Company's Human Rights Policy covers child labor, non-discrimination, and forced labour. In relation to freedom of association and collective bargaining, the Company states the following: 'Micron respects the rights of workers to form and join trade unions of their own choosing, to bargain collectively and to peacefully assemble as permitted under applicable local law'. However, no details found on alternatives for those countries where there are legal restrictions to the exercise of these rights. [Human Rights Policy, 2019: micron.com] Not met: UNGC principles 3-6 Not met: Explicitly list ALL four ILO for ICT suppliers: The Human Rights Policy applies to suppliers: 'To protect human rights beyond our direct operations, Micron further requires our suppliers and contractors to adopt the same or similar standards.' However, as indicated above, it is not clear if the Company commits to develop alternative mechanisms for locations where there are legal restrictions in

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>relation to freedom of association and collective bargaining. [Human Rights Policy, 2019: micron.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Explicit commitment to All four ILO Core: See above. [Human Rights Policy, 2019: micron.com] • Met: Respect H&S of workers: The Company is 'committed to providing all team members with a safe work environment.' It meets 'the RBA's standards for occupational safety, emergency preparedness, occupational injury and illness, industrial hygiene, physically demanding work, machine safeguarding, sanitation, food, housing and health and safety communication.' [Code of Business Conduct and Ethics, 8/2018: micron.com] • Met: H&S applies to ICT suppliers: The Company states the following: 'When it comes to safety, we hold our vendors, suppliers and contractors to the same high standard to which we hold ourselves.' [Code of Business Conduct and Ethics, 8/2018: micron.com] • Not met: working hours for workers: The Company states the following: 'we follow all applicable laws relating to working hours and wages, as well as all RBA Code of Conduct guidelines. Under these guidelines, work weeks must not exceed the maximum set by local law and, generally, should not be more than 60 hours per week, including overtime. In addition, all workers are allowed at least one day off every seven days.' However, no evidence found of references to standard weekly hours or the Company explicitly committing to respect ILO conventions on working hours. Similar evidence found in Human Rights policy. [Code of Business Conduct and Ethics, 8/2018: micron.com & Human Rights Policy, 2019: micron.com] • Not met: Working hours for ICT suppliers: The above also applies to suppliers. [Code of Business Conduct and Ethics, 8/2018: micron.com]
A.1.3.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 'is committed to ensuring that conflict minerals used in the manufacture of its Products do not directly or indirectly fund violence or human rights abuses in the Democratic Republic of the Congo or adjoining countries.' No evidence found, however, of a commitment to responsible sourcing of minerals from high risk areas beyond DRC or adjoining countries. [Supplier Quality Requirements Document, 5/3/2019: micron.com & Conflict Minerals Policy: micron.com] • Met: Based on OECD Guidance: The Company 'executes due diligence on the source and chain of custody of conflict minerals in its supply chain in conformance with the Organization for Economic Cooperation and Development Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas'. [Supplier Quality Requirements Document, 5/3/2019: micron.com & Conflict Minerals Policy: micron.com] • Not met: Requires responsible mineral sourcing from suppliers: The Company 'requires its suppliers to source conflict minerals from smelters validated (or on the path to validation) as compliant with conflict-free sourcing standards like the Conflict Free Smelter Program.' However, it is not clear if suppliers are required to responsible sourcing including high risk areas and carry out due diligence based on the OECD Guidance. [Supplier Quality Requirements Document, 5/3/2019: micron.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Responsible conflict mineral sourcing covers all minerals: The Company defines conflict minerals as 'those minerals regulated by Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act. They include columbite-tantalite, also known as coltan (and its derivative tantalum); cassiterite (and its derivative tin); wolframite (and its derivative tungsten); and gold.' This does not include all minerals. [Supplier Quality Requirements Document, 5/3/2019: micron.com] • Not met: Suppliers expected to make similar requirements of their suppliers: Micron requires Suppliers to comply, adopting 'a conflict mineral policy dedicated to the goal of achieving a conflict-free supply chain'. However, as stated above, this does not include all minerals. [Supplier Quality Requirements Document, 5/3/2019: micron.com]
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: Despite the Company has inclusion programmes, no evidence found of statement of commitment to respect women's rights. • Not met: Children's Rights: While the Company prohibits child labor, no commitment to respecting the rights of children could be found. [Human Rights Policy, 2019: micron.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • 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. [Code of Business Conduct and Ethics, 8/2018: micron.com] • Met: Expecting suppliers to respect these rights: The company indicates that it expects its suppliers to adopt and implement 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 Policy, 2019: micron.com & Supplier Quality Requirements Document, 5/3/2019: micron.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"> • Not met: Commits to stakeholder engagement: The Company discloses the following: 'Throughout our global operations we engage with both internal and external stakeholders, including: team members, customers, governmental organizations and representatives, shareholders, community and suppliers. However, no formal commitment to engage with affected stakeholders found. [2018 sustainability Report, 1/4/2018: micron.com] • Met: Regular stakeholder engagement: The Company discloses the following: 'Throughout our global operations we engage with both internal and external stakeholders, including: team members, customers, governmental organizations and representatives, shareholders, community and suppliers'. 'This outreach occurs at the both the local, subsidiary and corporate levels through a number of organizations to understand and address the nexus between our impacts and contributions to our communities and our obligations under local laws.' The Company discloses engagement carried out in its sustainability report, for each of these groups. For communities, for instance, states that 'engaging in supporting STEM education, engaging in local, regional, and national public policy dialogues, etc.' For employees, it included team member meetings (senior leaders host these meeting to inform and encourage team members to bring forward issues and questions), intranet used as social media platform for employees to post thoughts, opinions, questions and suggestions, etc. [2018 sustainability Report, 1/4/2018: micron.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Commits to engage stakeholders in design • Not met: Regular stakeholder design engagement
A.1.5	Commitment to remedy	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Commits to remedy <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Not obstructing access to other remedies • Not met: Collaborating with other remedy initiatives • Not met: Work with ICT suppliers to remedy impacts
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): The Company states the following: 'To keep all of our team members safe, we never engage in or tolerate any form of violence. This includes both threats and acts of violence, as well as intimidation, threatening conduct, bullying and attempts to instil fear in others.' Additionally, 'Micron is committed to creating a "speak up" environment where we can report suspected violations and participate in investigations without fear of retribution or retaliation. No one may retaliate against you for raising a concern or participating in an investigation in good faith. Anyone who retaliates against someone who makes a good faith report may be subject to discipline, up to and including termination.' It is unclear if this extends to people who oppose Company operations or who have raised questions about activities. [Code of Business Conduct and Ethics, 8/2018: micron.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	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: CEO or Board approves policy: 'Pursuant to our global policy framework, global policies are reviewed and vetted by a policy council comprised of director and vice president-level executives, initially approved by a policy committee comprised of senior and executive vice presidents, and finally approved by our Chief Executive Officer.' This includes the policies regarding human rights, slavery and human trafficking, environment, health and safety, etc. [2019 Sustainability report, 2019: micron.com] • Met: Board level responsibility for HRs: 'The purpose of the Governance and Sustainability Committee (the "Committee") of the Board of Directors (the "Board") of Micron Technology, Inc. (the "Company") shall be to: [...] Sustainability. Assist the Board in overseeing and monitoring the Company's development and integration of material social and environmental strategies.' Material issues include human rights. [Governance and sustainability committee charter, 29/4/2019: micron.com & 2018 sustainability Report, 1/4/2018: micron.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 • 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 • Met: Senior responsibility for HR: The Company has 'A Chief Compliance Officer responsible for compliance and ethics issues at Micron, a position currently held by Joel Poppen, Vice President of Legal Affairs, General Counsel, and Corporate Secretary.' This is the Executive sponsor for the Human Rights policy. [Compliance and Ethics Program, 24/4/2019: micron.com & Human Rights Policy, 2019: micron.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Day-to-day responsibility: 'The Steering Team met at least monthly during the year ended December 31, 2017 to review progress towards maintaining our goal of a responsibly-sourced supply chain. Oversight of the Conflict Minerals Steering Team was provided by a cross-functional Conflict Minerals Executive Team comprised of Vice President-level executives, which is charged with sponsoring and reviewing our conflict minerals program, and a newly-established Global Supply Chain Compliance Council, which is comprised of a subset of our Conflict Minerals Executive Team and charged with direct oversight of our responsible sourcing program. During the year ended December 31, 2017, the Global Supply Chain Compliance Council reported to the Conflict Minerals Executive Team on a monthly basis to review our progress towards our goal of achieving a responsibly-sourced supply chain.' However, no evidence found on how day-to-day responsibility is allocated for managing human rights issues beyond conflict minerals, company-wide. [Conflict minerals report, 2018: investors.micron.com] • Not met: Day-to-day responsibility for ICT in supply chain: See above. [Conflict minerals report, 2018: investors.micron.com]
B.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

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not met: At least one key ICT HR risk, beyond employee H&S Score 2 <ul style="list-style-type: none"> • Not met: Performance criteria made public
B.1.3	Integration with enterprise risk management	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: HR risks is integrated as part of enterprise risk system Score 2 <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	The individual elements of the assessment are met or not as follows: Score 1 <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: Employees are required to acknowledge that they have read and understood the Code of Conduct, which includes parts of the Company's human rights policy. The Code has been translated into seven languages. [Code of Business Conduct and Ethics, 8/2018: micron.com & 2019 Sustainability report, 2019: micron.com] Score 2 <ul style="list-style-type: none"> • Met: Commits to all 4 ILO core conventions • 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	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Commits to all 4 ILO core conventions for suppliers: See indicator A.1.2 • Not met: Communicating policy down the whole ICT supply chain • Met: Requiring ICT suppliers to communicate policy down the chain: The Company sends letters to suppliers communicating them the code application. The letter includes both RBA code and Micron code of business conduct. In the letter it is indicated that 'Micron and its subsidiaries expect suppliers to adopt and implement the RBA Code of Conduct and Micron Code of Business Conduct and Ethics regardless of local business practices or social customs. Micron will also monitor your adherence to these codes, which may include verification visits and audits'. In addition, The RBA Code of Conduct states that 'At a minimum, Participants shall also require its next tier suppliers to acknowledge and implement the Code.' [Global Supply Chain Vice President's RBA statement, 6/5/2019: micron.com & RBA Code of Conduct, 1/1/2018: responsiblebusiness.org] Score 2 <ul style="list-style-type: none"> • Not met: How HR commitments made binding/contractual • 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 <ul style="list-style-type: none"> • Not met: Scores at least 1 on A.1.2 • Met: Trains all workers on HR policy commitments: The Company's employees 'receive regular computer-based training and certify annually that they have read, understand and will continue to comply with the Code' of Conduct. 'The Code and all other global policies, including translations in seven languages, are available to all team members on an internal SharePoint site.' The Company 'believes strongly in the importance of up-to-date, comprehensive and easy to understand and follow ethics and compliance policies and practices. Every employee, manager and officer at Micron is expected to live up to these standards and is required to attend regular training sessions on ethics and compliance issues.' [2018 sustainability Report, 1/4/2018: micron.com & Compliance and Ethics Program, 24/4/2019: micron.com] • Not met: Trains relevant ICT managers including procurement: The Company 'provides managers and its employees who have direct responsibility for supply chain management with knowledge and information regarding Micron's requirements, including RBA compliance.' No details found, however, on how procurement teams and managers are trained. [Slavery and Human Trafficking, 25/4/2019: micron.com] Score 2 <ul style="list-style-type: none"> • Not met: Score of 2 on 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 <ul style="list-style-type: none"> • Not met: Scores at least 1 on A.1.2 • Met: Monitoring implementation of HR policy commitments: The Company is audited by the RBA to monitor compliance with the RBA Code of Conduct, and 'all 12 Micron manufacturing facilities earned perfect scores of 200 on RBA audits, qualifying these sites for RBA Platinum recognition.' [2018 sustainability Report,

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>1/4/2018: micron.com & Auditee Preparation RBA, 8/2019: responsiblebusiness.org</p> <ul style="list-style-type: none"> • Met: Monitoring ICT suppliers: As stated above, the Company performs audits across its supply chain. The Company 'may develop a mitigation plan and request improvement actions of any suppliers found to be out of compliance or the supplier may be removed from the supply base. Micron may establish corrective action plans, scorecard reviews or other plans to improve suppliers' risk profiles.' [Human Rights Policy, 2019: micron.com & 2019 Sustainability report, 2019: micron.com] Score 2 • Not met: Score of 2 on A.1.2 • Not met: Describes corrective action process • Not met: Example of corrective action • Not met: Discloses % of ICT supply chain monitored
B.1.7	Engaging business relationships	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: HR affects ICT selection of suppliers: Conflict minerals affect the decision to begin negotiations. Additionally, other 'Suppliers identified as high-risk may be audited in person to ensure they are in compliance with' the Company's Code of Conduct. The Company 'may develop a mitigation plan and request improvement actions of any suppliers found to be out of compliance or the supplier may be removed from the supply base.' This process applies to both the selection of new suppliers and renewal of supplier relationships. [Supplier Quality Requirements Document, 5/3/2019: micron.com & 2019 Sustainability report, 2019: micron.com] • Met: HR affects on-going ICT supplier relationships: See above <p>Score 2</p> <ul style="list-style-type: none"> • Met: Both requirement under score 1 met • Not met: Working with ICT suppliers to improve performance: The Company states the following: 'Micron is currently working with RBA and several suppliers in Taiwan to better understand foreign migrant workers' experiences and address any violations that may be occurring in these locations. During an assessment of two of these suppliers in 2018, [...] we discovered some dorm overcrowding at one supplier site due to an increase in workers. We expect this supplier to make improvements promptly to its workers' living conditions.' However, this indicator looks for proactive work carried out together with suppliers to improve their practices (not as a response to non-compliances). [2019 Sustainability report, 2019: micron.com]
B.1.8	Approach to engagement with potentially affected stakeholders	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Stakeholder process or systems • Not met: Frequency and triggers for engagement • Not met: Workers in ICT SC engaged • Not met: Communities in the ICT SC engaged <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	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Identifying risks in own operations • Not met: Identifying risks in ICT suppliers <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Ongoing global risk identification • Not met: In consultation with stakeholders • Not met: In consultation with HR experts • Not met: Triggered by new circumstances
B.2.2	Assessing: Assessment of risks and impacts identified (salient risks and key industry risks)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Salient risk assessment (and context): The Company describes the following: 'At Micron we regularly assess risks, including human-rights-related risks, and we regularly review our policies to ensure we are appropriately addressing these risks. [...] We regularly conduct due diligence and audits across our supply chain to assess supplier compliance with these and other requirements.' The Company describes its process to assess risks from its different suppliers (assesses suppliers, gives them a score, audits and carries out plans). However, it is not clear the process it follows to assess the different human rights it faces as a Company. Evidence seems to focus in determining suppliers' specific risks and compliance, as

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>the Company also reports evidence of audits. [Human Rights Policy, 2019: micron.com & 2019 Sustainability report, 2019: micron.com]</p> <ul style="list-style-type: none"> • Not met: Public disclosure of salient risks <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met
B.2.3	Integrating and Acting: Integrating assessment findings internally and taking appropriate action	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Action Plans to mitigate risks: In order to mitigate risks, the Company updates its policies following the risk assessment. 'At Micron we regularly assess risks, including human-rights-related risks, and we regularly review our policies to ensure we are appropriately addressing these risks. With board oversight and through several senior and executive level councils and committees, we seek relevant guidance from stakeholders and subject matter experts and perform appropriate assessments and adopt and implement policies we deem needed.' [Human Rights Policy, 2019: micron.com] • Not met: Including in ICT supply chain: Although the Company provides evidence of supply chain monitoring, this indicator looks for evidence of general action plans carried out to prevent and mitigate human right salient issues of its supply chain. Evidence found focuses in due-diligence audits for monitoring compliance with policies. [2019 Sustainability report, 2019: micron.com] • Not met: Example of Actions decided: The Company indicates that it is implementing 'Responsible Business Alliance's guidelines on working hours, which state that employees in all functions should work no more than 60 hours per week, with one day off every six days. We are also expanding offerings to support employee mental health'. However, this indicator looks for evidence of action plans taken as a response to human rights salient issues identified. The Company describes these actions, however, it is not clear if it is made in the context of an improvement action plan due to an assessed salient issue. [2019 Sustainability report, 2019: micron.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met
B.2.4	Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: System to check if Actions are effective: The Company provided evidence of monitoring its Human Rights commitments, however, no description of a system to monitor actions taken could be found. • Not met: Lessons learnt from checking effectiveness <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirement under score 1 met
B.2.5	Communicating : Accounting for how human rights impacts are addressed	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Comms plan re identifying risks • Not met: Comms plan re assessing risks • Not met: Comms plan re action plans for risks • Not met: Comms plan re reviewing action plans • Not met: Including ICT suppliers <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Responding to affected stakeholders concerns • Not met: Ensuring affected stakeholders can access communications

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	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Channel accessible to all workers: Questions or concerns are directed to the department manager. If the complainant is not comfortable doing so, the alternative is the Compliance Hotline. The Company's Compliance Hotline is 'an ethics and compliance reporting service provided by the Company that permits anyone—employees, customers, vendors, agents, suppliers or members of the general public—to ask questions, report concerns, or follow up on matters on which they have already reported.' [EthicsPoint FAQ, 24/4/2019: secure.ethicspoint.com & Code of Business Conduct and Ethics, 8/2018: micron.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Number grievances filed, addressed or resolved

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Met: Channel is available in all appropriate languages: The Company 'has established toll-free numbers in every country in which the Company has facilities. Multilingual operators are available so that callers can make reports or ask questions in their native tongue.' [EthicsPoint FAQ, 24/4/2019: secure.ethicspoint.com] • Not met: Expect ICT supplier to have equivalent grievance systems • Met: Opens own system to ICT supplier workers: As stated above, the mechanism is available to suppliers. [EthicsPoint FAQ, 24/4/2019: secure.ethicspoint.com]
C.2	Grievance channel(s)/mechanism(s) to receive complaints or concerns from external individuals and communities	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Grievance mechanism for community: As stated in C.1, the Compliance Hotline is available to members of the general public. [EthicsPoint FAQ, 24/4/2019: secure.ethicspoint.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Describes accessibility and local languages: As stated previously, the channel is available in all relevant languages where the Company operates. 'The Compliance Hotline has two methods of intake. The first is by toll-free telephone number, which is staffed 24 hours a day, seven days a week, every day of the year. When you call, a professionally trained EthicsPoint intake specialist will guide you through a series of questions designed to identify the relevant details of your report or question. [...] The second option is to use the web intake portal system. This intake portal is available anywhere that you have access to the Internet. The intake portal asks you for the same types of relevant details about your question or concern as the telephone-based system. Again, you may choose to remain anonymous, and EthicsPoint will make no attempt to track your web address or otherwise identify you.' [EthicsPoint FAQ, 24/4/2019: secure.ethicspoint.com] • Not met: Expects ICT supplier to have community grievance systems • Not met: ICT supplier communities use global system
C.3	Users are involved in the design and performance of the channel(s)/mechanism(s)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Engages 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 • 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	<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 'must respond by conducting timely, thorough, and objective investigations to determine what happened and why.' However, no exact timescale for addressing the concerns could be found. [Micron Internal Investigations Guidelines: business-humanrights.org] • Not met: How complainants will be informed: The Company states the following: 'At the close of the investigation, the investigator or appropriate Micron representative should provide an update to the person who raised the concern and any persons who were investigated as a subject of the investigation'. However, no description of how the person should go about updating the complainant could be found. [Micron Internal Investigations Guidelines: business-humanrights.org] • Not met: Who is handling the complaint <p>Score 2</p> <ul style="list-style-type: none"> • Met: Escalation to senior/independent level: It may be necessary to 'escalate a complaint or allegation to Legal/Compliance, senior HR leadership, supervisors and/or to senior management, and/or, after consultation with Legal/Compliance, to Micron's Audit Committee Chair, Audit Committee, or Board of Directors.' [Micron Internal Investigations Guidelines: business-humanrights.org]
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: The Company states the following: 'No one may retaliate against you for raising a concern or participating in an investigation in good faith. Anyone who retaliates against someone who makes a good faith report may be subject to discipline, up to and including termination.' [Code of Business Conduct and Ethics, 8/2018: micron.com] • Met: Practical measures to prevent retaliation: The third party Compliance Hotline allows for anonymous reporting. [Human Rights Policy, 2019: micron.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Has not retaliated in practice • Not met: Expects ICT suppliers to prohibit retaliation

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.6	Company involvement with State-based judicial and non-judicial grievance mechanisms	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Won't impede state based mechanisms • Not met: Complainants not asked to waive rights Score 2 <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)
C.7	Remedying adverse impacts and incorporating lessons learned	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Describes how remedy has been provided • Not met: Says how it would remedy key sector risks Score 2 <ul style="list-style-type: none"> • Not met: Changes introduced to stop repetition • Not met: Approach to learning from incident to prevent future impacts • Not met: Evaluation of the channel/mechanism

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 <ul style="list-style-type: none"> • Not met: Living wage target timeframe • Not met: Describes how living wage determined Score 2 <ul style="list-style-type: none"> • 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 <ul style="list-style-type: none"> • Not met: Living wage in supplier code or contracts • Not met: Improving living wage practices of suppliers Score 2 <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	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Avoids business model pressure on HRs • Not met: Positive incentives to respect human rights Score 2 <ul style="list-style-type: none"> • 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 <ul style="list-style-type: none"> • Not met: Identifies suppliers back to product source: The Company may request 'basic information about supplier's supply chain resiliency using Supply Chain Mapping, which includes data-points such as manufacturing locations, emergency contacts, recovery time objectives, and locations of critical sub-tier suppliers.' Additionally, it discloses that it maps suppliers at the manufacturing level. However, it is unclear whether this includes all direct and indirect suppliers and components. [Supplier Quality Requirements Document, 5/3/2019: micron.com & 2019 Sustainability report, 2019: micron.com] Score 2 <ul style="list-style-type: none"> • Not met: Discloses significant parts of supply chain and why: The Conflict Minerals Report includes a list of smelters/refiners, however, no further evidence found about public list of all suppliers. [Conflict minerals report, 2018: investors.micron.com]
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 <ul style="list-style-type: none"> • Met: Does not use child labour: Child labour is not used in any Company operations. [Code of Business Conduct and Ethics, 8/2018: micron.com] • Not met: Age verification of job applicants and workers: Factories 'are regularly audited for conformance with these standards and our hiring policy requires team members to be 18 or older.' However, it is unclear that the Company verifies the age of the employee at the time they are hired. [2018 sustainability Report, 1/4/2018: micron.com] Score 2 <ul style="list-style-type: none"> • Not met: Remediation if children identified

Indicator Code	Indicator name	Score (out of 2)	Explanation
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 <ul style="list-style-type: none"> • Not met: Child Labour rules in codes or contracts: Although there is a commitment against child labour, no details found in relation to age verification measures nor remediation programmes in case child labour is found. [Code of Business Conduct and Ethics, 8/2018: micron.com & RBA Code of Conduct, 1/1/2018: responsiblebusiness.org] • Not met: How working with suppliers on child labour Score 2 <ul style="list-style-type: none"> • 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 <ul style="list-style-type: none"> • Not met: Pays workers in full and on time • Not met: Payslips show any legitimate deductions [Code of Business Conduct and Ethics, 8/2018: micron.com] Score 2 <ul style="list-style-type: none"> • 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)	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Debt and fees rules in codes or contracts: The code of business conduct and ethics contains a commitment against forced labour. In addition, in the context of fair labour standards, the code states that "we hold our suppliers to the same high standards that we hold ourselves to. This means we expect our suppliers to embrace and follow this code and the RBA Code". The RBA code in these matters states that: '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.' [RBA Code of Conduct, 1/1/2018: responsiblebusiness.org] • Not met: How working with suppliers on debt & fees: The Company 'is currently working with RBA and several suppliers in Taiwan to better understand foreign migrant workers' experiences and address any violations that may be occurring in these locations. During an assessment of two of these suppliers in 2018, we found that they do not charge fees to these workers and do not have issues related to working hours. [...] Micron aims to continue to further investigate foreign worker journeys from home country to working country among our key suppliers and address any forced labor violations.' However, no description of how the Company works with suppliers to eliminate imposing financial burdens on workers could be found. [2019 Sustainability report, 2019: micron.com] Score 2 <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met • Not met: Provide analysis of trends in progress made
D.4.5.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 <ul style="list-style-type: none"> • Met: Does not retain documents or restrict movement: The Company's code of conduct contains a commitment against forced labour. The code of conduct also states that 'we all are expected to comply with the RBA code of conduct and ensure our suppliers do the same. Our code includes information about a number of important provisions of the RBA Code of Conduct on a general basis. For more information about these topics, please refer to the RBA Code of conduct'. In relation to this particular topic, the RBA code states that: '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. [...] 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.' [RBA Code of Conduct, 1/1/2018: responsiblebusiness.org & Code of Business Conduct and Ethics, 8/2018: micron.com] Score 2 <ul style="list-style-type: none"> • Not met: How sure about agencies or brokers

Indicator Code	Indicator name	Score (out of 2)	Explanation
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: The code of business conduct and ethics contains a commitment against forced labour. In addition, in the context of fair labour standards, the code states that "we hold our suppliers to the same high standards that we hold ourselves to. This means we expect our suppliers to embrace and follow this code and the RBA Code". The Rba code in this matters states that: '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. [...] 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.' [RBA Code of Conduct, 1/1/2018: responsiblebusiness.org] • Not met: How these practices are implemented and monitored for agencies, labour brokers or recruiters: CHRB could find no description of how the Company works with suppliers to eliminate actions that physically restrict worker movement. <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.a	Freedom of association and collective bargaining (in own production or manufacturing operations)	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: Commits not to interfere with union rights and collective bargaining and prohibits intimidation and retaliation: The Company 'respects the rights of workers to form and join trade unions of their own choosing' and to bargain collectively. It also does not 'engage in or tolerate any form of violence. This includes both threats and acts of violence, as well as intimidation, threatening conduct, bullying and attempts to instil fear in others'. However, no description of measures in place to prohibit intimidation or threats to workings seeking to exercise these rights could be found, nor whether commitment to non-retaliation covers people seeking to exercise these rights (no evidence found in publicly available sources mentioning explicitly this case). [Human Rights Policy, 2019: micron.com & Code of Business Conduct and Ethics, 8/2018: micron.com] • Met: Discloses % covered by collective bargaining: '12 percent of Micron's workforce is covered by collective bargaining agreements.' [2019 Sustainability report, 2019: micron.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirement under score 1 met
D.4.6.b	Freedom of association and collective bargaining (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: FoA & CB rules in codes or contracts: Suppliers are required to adopt similar standards to those in the Human Rights Policy and Code of Conduct. The Human Rights Policy outlines the respect of the right to Freedom of Association and to Collective Bargain: 'Micron respects the rights of workers to form and join trade union associations of their own choosing, to bargain collectively and to peacefully assemble as permitted under applicable local law'. However, no details found on alternatives for those countries where there are legal restrictions to the exercise of these rights. The Code of Conduct states the following relating to general intimidation and harassment: 'we never engage in or tolerate any form of violence. This includes both threats and acts of violence, as well as intimidation, threatening conduct, bullying and attempts to instil fear in others'. However, no particular evidence found in relation to union members or representatives. Finally, the RBA code, that applies to suppliers, indicates in the context of Freedom of association and collective bargaining that '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.' However, the same way that the human rights policy, the RBA code commits to collective bargaining 'in conformance with local law', not making clear whether there would be alternative mechanisms in those places where there are legal restrictions. [Human Rights Policy, 2019: micron.com & Code of Business Conduct and Ethics, 8/2018: micron.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

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.4.7.a	Health and safety: Fatalities, lost days, injury rates (in own production of manufacturing operations)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Injury Rate disclosures: The Company continues 'to report a recordable injury rate of 0.32.' [2019 Sustainability report, 2019: micron.com] • Not met: Fatalities disclosures • Not met: Occupational disease rates Score 2 <ul style="list-style-type: none"> • Not met: Set targets for H&S performance • Not met: Met targets or explains why not
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 <ul style="list-style-type: none"> • Met: Sets out clear Health and Safety requirements: Suppliers are required to abide by the Company's code of ethics and the RBA code. The Code discloses the RBA commitment and establishes a list of requirements for supervisors and for all team members, including protective equipment, training, hazard identification, ergonomic guidelines, etc. [Code of Business Conduct and Ethics, 8/2018: micron.com] • Not met: Injury rate disclosures • Not met: Lost days or near miss disclosures • Not met: Fatalities disclosures • Not met: Occupational disease rates Score 2 <ul style="list-style-type: none"> • Not met: How working with suppliers on H&S • Not met: Provide analysis of trends in progress made
D.4.8.a	Women's rights (in own production or manufacturing operations)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Process to stop harassment and violence • Not met: Working conditions take account of gender: The Company allows for flexible work arrangements and has a Team Member Assistance Program, which includes helping finding child care at no cost to the employee. Specific to women's reproductive health, the Company describes its Mother's Room Guidelines: 'Supervisors will provide nursing mothers reasonable break time to express breast milk for their nursing child for a period of up to two years after the birth of their child. [...] Understanding that every mother's situation is unique, a general guideline for supervisors is that expression may take 20-30 minutes at a time and may need to happen every two to three hours'. However, no details found in relation to impacts at work related to reproductive health (work positions that might affect reproductive health). [Benefits & Wellbeing - Mothers' Rooms, 2019: business-humanrights.org] • Not met: Equality of opportunity at all levels: The Company has stated the following: 'The executive team has established an ongoing companywide global goal to eventually reach 50 percent hiring of women as more and more women become available through our recruiting efforts, as well as to increase our hiring from underrepresented groups. To accomplish this goal, we will increase focus on recruiting at universities and colleges that have high graduation rates for women and underrepresented groups, including women's colleges and historically black colleges.' However, no evidence found that this is monitored throughout all levels of employment. [Diversity and Inclusion report, 2018: micron.com] Score 2 <ul style="list-style-type: none"> • 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 <ul style="list-style-type: none"> • Not met: Women's rights in codes or contracts • Not met: How working with suppliers on women's rights Score 2 <ul style="list-style-type: none"> • 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 <ul style="list-style-type: none"> • Not met: Respects max hours, min breaks and rest periods in its own operations: The Code of business conduct and ethics, following the RBA code, states that: 'work weeks must not exceed the maximum set by local law and, generally, should not be more than 60 hours per week, including overtime. In addition, all workers are allowed at least one day off every seven days.' However, no evidence found of references to international standards, standard weekly hours. [Code of Business Conduct and Ethics, 8/2018: micron.com] Score 2 <ul style="list-style-type: none"> • Not met: How it implements and checks this

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.4.9.b	Working hours (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: Working hours in codes or contracts: Code of business conduct and ethics, required for suppliers, states that 'we follow all applicable laws relating to working hours and wages, as well as all RBA Code of Conduct guidelines. Under these guidelines, work weeks must not exceed the maximum set by local law and, generally, should not be more than 60 hours per week, including overtime. In addition, all workers are allowed at least one day off every seven days'. However, no evidence found of references to international standards, standard weekly hours. [Code of Business Conduct and Ethics, 8/2018: micron.com] Not met: How working with suppliers on working hours <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.4.10.a	Responsible Mineral Sourcing: Arrangements with Suppliers and Smelters/Refiners in the Mineral Resource Supply Chains	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 due diligence in supplier contracts: The Company seeks 'to align to international due diligence best practices set forth in the Organization for Economic Co-operation and Development's (OECD) Due Diligence Guidelines for Responsible Supply Chains of Minerals from Conflict-Affected and High Risk Areas'. These requirements include providing Conflict Minerals Reporting Templates, updating them within two weeks of any changes, adopting a conflict mineral policy, participating in audits, and adopting contractual provisions in agreements to adopt conflict mineral policies in the supply chain and complete diligence surveys. However, it is not clear if contractual/commercial agreements with suppliers require them to carry out their due diligence explicitly based on OECD Guidelines [2019 Sustainability report, 2019: micron.com & Supplier Quality Requirements Document, 5/3/2019: micron.com] Not met: Builds capacity with smelters/refiners: The Company describes the following: 'Throughout 2017, we worked with our suppliers to help raise awareness of our expectations, provide ongoing education concerning our requirements, and provide training through our risk mitigation and escalation process.' Additionally, the Company states that it is an active member of the Responsible Minerals Initiative, and in its 2019 SEC Disclosure state that 'in 2018, we continued to improve our outreach process by introducing a new Supplier Compliance Training that we required all new and 3TG-exposed suppliers to take, which helped increase awareness of and focus on our requirement that Micron suppliers may only use Conformant smelters and refiners'. No evidence found, however, on capacity building of smelters/refiners. [SEC filing Conflict Minerals Disclosure, 31/05/2019: investors.micron.com & 2019 Sustainability report, 2019: micron.com] <p>Score 2</p> <ul style="list-style-type: none"> Met: Disclosure of smelter information in supplier requirements: Supplier compliance includes updating 'CMRTs within two (2) weeks of any smelter or refiner changes within the entire supply chain. Such changes may include adding a new smelter, removal of a smelter, or when a smelter changes on the CFSI list.' Suppliers must also 'report 100% of their supply chain and only source from Conformant smelters and refiners'. As indicated above, Company's conflict mineral requirements include 'adopting contractual provisions in suppliers' supply chain agreements to adopt conflict mineral policies and complete necessary conflict mineral diligence surveys'. [Supplier Quality Requirements Document, 5/3/2019: micron.com] Not met: Responsible conflict mineral sourcing covers all minerals
D.4.10.b	Responsible Mineral Sourcing: Risk Identification in 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"> Not met: Risk identification and disclosure in line with OECD Guidance: In relation to risk assessment, the Company indicates that it screened and analysed templates from all 3TG-exposed suppliers. 'We reviewed all CMRT responses and updates received [...] and determined whether the disclosed smelters were recognized by RMI or equivalents as processors of 3TG metals, and if so, whether they had been validated as Conformant with these organizations'. Additionally, it is 'committed to ensuring that minerals used in the manufacture of our products do not directly or indirectly fund violence or human rights abuses in the DRC or adjoining countries.' However, no further details found on identifying which particular risks can it face, including a disclosure of risks identified (or potential risks that it might face). [SEC filing Conflict Minerals Disclosure, 31/05/2019: investors.micron.com & 2019 Sustainability report, 2019: micron.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Met: Identification of smelter/refiners and OECD due diligence: The Company describes the following: 'Through the CMRT [Conflict Minerals Reporting Template] we request information from suppliers regarding their 3TG supply chains, including the names and locations of smelters and refiners of 3TG as well as the country of origin of 3TG processed by such smelters and refiners. We then ask that suppliers review and acknowledge our Conflict Minerals Policy and our SQRD, which sets out our expectations that all smelters and refiners in our supply chain are, and remain, validated as Conformant'. 'We reviewed all CMRT responses and updates received for the year ended December 31, 2018 and determined whether the disclosed smelters or refiners were recognized by RMI or equivalents as processors of 3TG metals, and if so, whether they had been validated as Conformant with these organizations.' [Conflict minerals report, 2018: investors.micron.com] Score 2 • Met: Discloses smelters/refiners judged in line with OECD due diligence: The Company discloses the following: 'Based on the information provided by our suppliers and our due diligence efforts through December 31, 2018, we identified a total of 261 smelters and refiners we believe were in our memory and storage products supply chain at any point during the year ended December 31, 2018, all of which were validated as Conformant at the time they entered our supply chain. It discloses these smelters/refiners, including information about what metal they produce, their name, and smelter ID. [Conflict minerals report, 2018: investors.micron.com & SEC filing Conflict Minerals Disclosure, 31/05/2019: investors.micron.com] • Not met: Responsible conflict mineral sourcing covers all minerals
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: Score 1</p> <ul style="list-style-type: none"> • Met: Describes mineral risk management plan for supply chain: The Company describes the following: 'We reviewed all CMRT responses and updates received for the year ended December 31, 2017 and determined whether the disclosed smelters or refiners were recognized by RMI or equivalents as processors of 3TG metals, and if so, whether they had been validated as Conformant with these organizations. We reviewed supplier CMRTs for accuracy and overall adherence to our conflict minerals requirements, as delivered through our inquiry letter to suppliers, and we began our risk mitigation (and escalation processes, if necessary) set out in our conflict minerals procedures with suppliers having disclosed any smelters or refiners that were not Conformant. If a supplier reports a CMRT that includes smelters or refiners not yet listed as Conformant, we implement our risk mitigation procedures, beginning with direct outreach to the supplier and escalating discussions up the management structure of our respective companies. We work with these suppliers throughout the risk mitigation process to provide awareness of Micron's goal to only source from Conformant smelters or refiners'. The Company also participates in RMI smelter engagement team tasked with influencing smelters in the supply chains of RMI members to join the RMAP and become validated. It also works with teams to define future protocols, procedures, issue resolutions and training. [Conflict minerals report, 2018: investors.micron.com] • Not met: Monitoring, tracking and whether better risk prevention/mitigation over time: The Company found all its smelters and refiners to be Conformant with the RMI Responsible Minerals Assurance Process, which means there are no smelters with potential risks. However, no description of a process to monitor and track effectiveness of risk prevention and mitigation measures could be found. [SEC filing Conflict Minerals Disclosure, 31/05/2019: investors.micron.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 15.36 out of 80 points scored in themes A-D & F has been applied to produce a score of 3.84 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 out of 4	Out of a total of 52 indicators assessed under sections A-D of the benchmark, Micron Technology made data public that met one or more elements of the methodology in 26 cases, leading to a disclosure score of 2 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's sustainability report 'has been prepared in accordance with the GRI Standards: Core option.' It discloses a GRI index. [2018 sustainability Report, 1/4/2018: micron.com]
F.3	Key, High Quality Disclosures	0 out of 4	Micron Technology met 0 of the 10 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 <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 Demonstrating a forward focus <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 • 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

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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